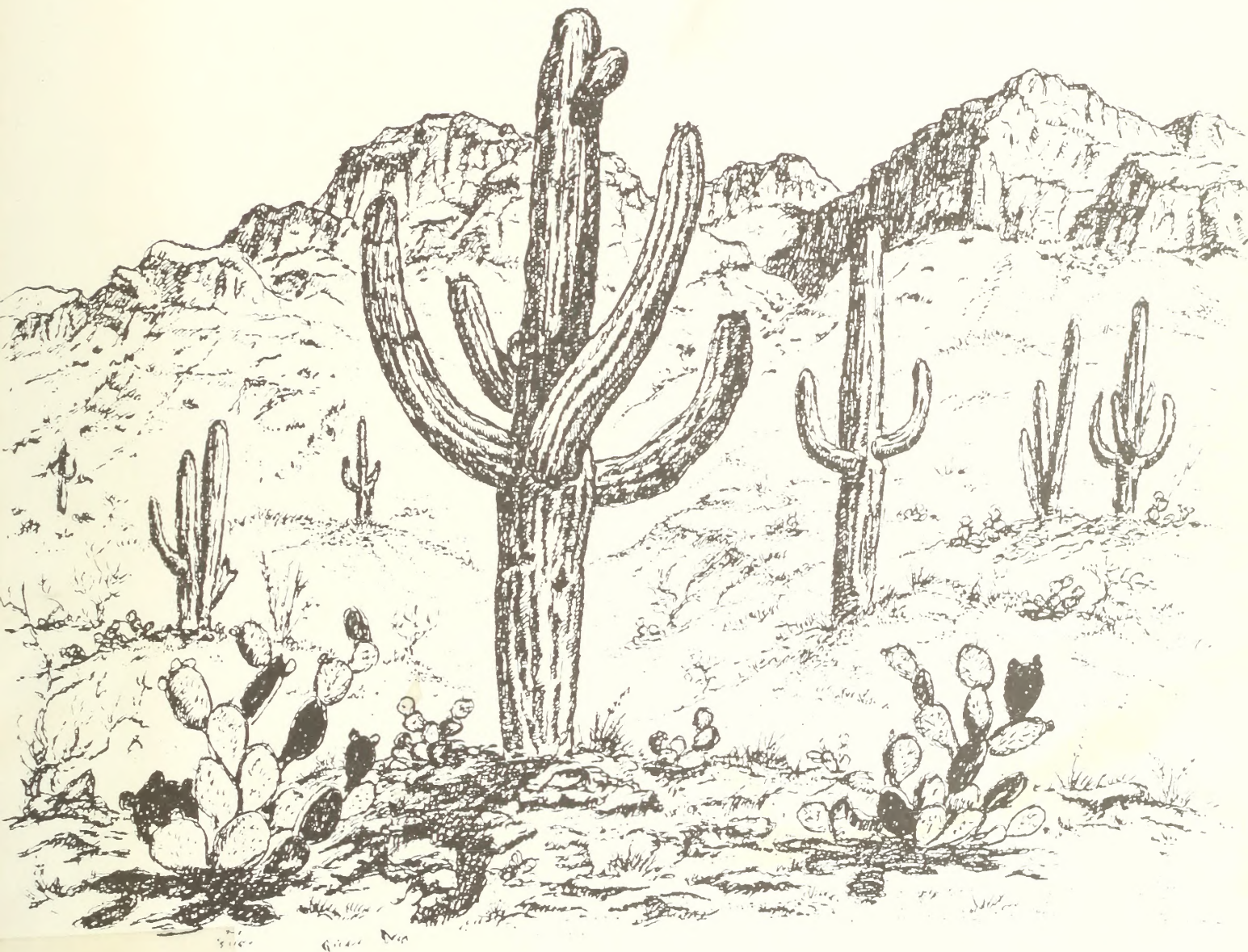




# EASTERN ARIZONA GRAZING ENVIRONMENTAL IMPACT STATEMENT FINAL



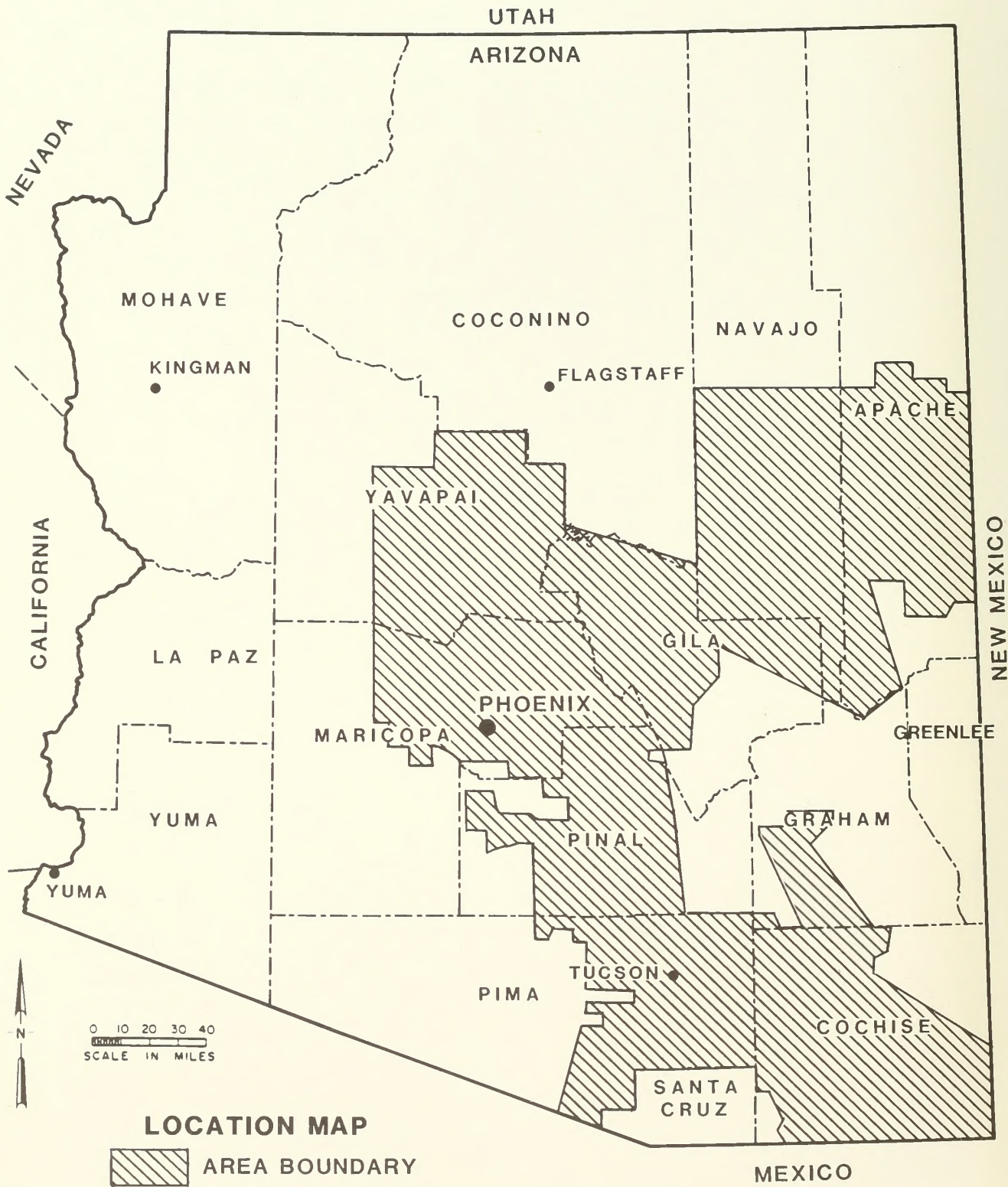
U. S. Department of the Interior  
Bureau of Land Management

PHOENIX AND SAFFORD DISTRICTS ARIZONA

SEPTEMBER 1986

15.35  
A6  
E277  
1986







# United States Department of the Interior

BUREAU OF LAND MANAGEMENT

1792 (040)

ARIZONA STATE OFFICE

3707 N. 7th Street

P.O. Box 16563

Phoenix, Arizona 85011

September, 1986

Enclosed is the final Environmental Impact Statement (EIS) for grazing management in the Eastern Arizona Study Area. The study area is comprised of the Phoenix Resource Area in the Phoenix District and portions of the Gila Resource Area and San Simon Resource Area in the Safford District. The draft EIS was sent to you earlier. The final EIS consists of comments received on the draft EIS, responses to those comments and errata. No changes of substance in the analysis of the proposal or its impacts were required by the comments received on the draft statement.


This final EIS should be used with the draft for a full understanding of the analysis, comments and responses.

This EIS will be used by BLM managers in making decisions affecting the grazing management program on public lands in the planning area. Shortly after the final document is filed with the Environmental Protection Agency (EPA), the Phoenix and Safford District Offices of the Bureau of Land Management will prepare a Rangeland Program Summary (RPS) that outlines a broad decision for rangeland management in the areas.

Copies of the RPS will be sent to the interested public. Concurrently, the District will begin a consultation process with range users, government agencies and other parties involved in rangeland management. This consultation will lead to the development of specific decisions for each grazing allotment.

Thank you for your interest in this EIS.

Sincerely



D. Dean Bibles  
State Director

Enclosure





#14478627

880/8976

SF  
85.35  
.A6  
E277  
1986

**FINAL**  
**ENVIRONMENTAL IMPACT STATEMENT**  
**PROPOSED GRAZING MANAGEMENT PROGRAM**  
**for the**  
**EASTERN ARIZONA EIS AREA**

GRAHAM, COCHISE, PIMA, PINAL, GILA, MARICOPA,  
 YAVAPAI, COCONINO, APACHE, AND  
 NAVAJO COUNTIES, ARIZONA

**BLM LIBRARY**  
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**P. O. BOX 25047**  
**DENVER, CO 80225-0047**

prepared by  
 Department of the Interior  
 Bureau of Land Management  
 PHOENIX AND SAFFORD DISTRICT



State Director  
 Arizona State Office

This draft environmental impact statement (EIS) addresses future grazing management options for approximately one million acres of public lands administered by the Bureau of Land Management (BLM) through its Phoenix and Safford District Offices. The EIS recommends levels of livestock grazing management, identifies needed range improvements, and outlines a schedule of implementation. Measures to protect or enhance environmental resources have been incorporated into the program. Alternatives considered in addition to the proposed action include Continuation of Present Management (No Action) Reduced Livestock Use and No Livestock Grazing. A concise description of the affected environment and an analysis of the environmental consequences resulting from implementation of the proposed action and each alternative is included in the document.

For Further Information Contact: Jerrold Coolidge, EIS Team Leader, Safford District, Bureau of Land Management, 425 E. 4th Street, Safford, AZ 85546, or call (602) 428-4040, or James Anderson, Assistant Team Leader, Phoenix District, Bureau of Land Management, 2015 West Deer Valley Road, Phoenix, AZ 85027, or call (602) 863-4464.

Date Statement made available to EPA and public  
 Draft: ~~September 26, 1985~~ SEP 26 1985  
 Final: SEP 19 1985

ENVIRONMENTAL IMPACT STATEMENT

PROPOSED GRAZING MANAGEMENT PROGRAM

IN THE

EASTERN PLAINS OF THE STATE OF COLORADO

GRASSLAND ECOSYSTEM RESTORATION AND  
WATERFOWL HUNTING HABITAT  
RECOVERY PROJECT

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Department of the Interior  
Bureau of Land Management  
Federal Office Building  
1915 North Speer Boulevard  
Denver, Colorado 80202

*[Faint signature]*

Special Agent in Charge

Wildlife Management Division

This is an environmental impact statement for the proposed grazing management program in the Eastern Plains of the State of Colorado. The program is designed to restore grassland ecosystems and provide habitat for waterfowl. The program will be implemented in the following areas: [faint text]

The proposed program is consistent with the National Environmental Policy Act of 1969 and the Federal Land Management Policy Act of 1976. The program is also consistent with the Bureau of Land Management's grazing management policy.

Prepared by: [faint text]  
Date: [faint text]

# TABLE OF CONTENTS

	Page No.
List of Agencies, Organizations and Persons to whom copies of the Statement were sent .....	1
Comments and Responses .....	3
Review Process .....	3
Written Comments .....	4
General Responses to Comments .....	30
Specific Responses to Comments .....	31
Errata .....	38
Maps .....	43, 49





# LIST OF AGENCIES, ORGANIZATIONS AND PERSONS TO WHOM COPIES OF THE STATEMENT WERE SENT

BLM sent copies of the draft EIS and requested copies from all affected grazing permittees, interested individuals and the following agencies and interest groups:

## Federal Agencies

Advisory Council on Historic Preservation  
Agricultural Stabilization and Conservation Service  
Army Corps of Engineers  
Bureau of Indian Affairs  
Bureau of Mines  
Bureau of Reclamation  
Council on Environmental Quality  
Department of Commerce  
Department of Defense  
Department of Interior  
Environmental Protection Agency  
Fish and Wildlife Service  
Forest Service  
Geological Survey  
National Park Service  
Soil Conservation Service

## County Supervisors and Planning Boards

Apache County  
Cochise County  
Coconino County  
Gila County  
Graham County  
Maricopa County  
Mohave County  
Navajo County  
Pima County  
Pinal County  
Santa Cruz County  
Yavapai County  
Central Arizona Association of Governments  
District 4 Council of Governments  
Local Indian tribal leaders  
Maricopa Association of Governments  
Northern Arizona Council of Governments  
Southeast Arizona Government Organizations

## Arizona State Agencies

Agriculture and Horticulture Commission  
Clearing House  
Department of Library, Archives and Public Records  
Department of Transportation  
Game and Fish Department  
Governor's Commission Arizona Environment  
Office of Economic Planning and Development  
Natural Heritage Program  
State Historic Preservation Officer  
State Land Commissioner  
State Land Department  
State Parks Board  
University of Arizona  
Water Resources Department

## Special Interest Groups

Arizona Cattlegrowers Association  
Arizona Desert Bighorn Sheep Society  
Arizona 4-wheel Drive Association  
Arizona State Association 4-Wheel Drive Clubs  
Arizona Wildlife Federation  
Arizona Woolgrowers Association  
Audubon Society  
Cochise Cattlegrowers Association  
Defenders of Wildlife  
Desert Tortoise Council  
League of Women Voters  
National Council of Public Land Users  
Natural Resources Defense Council  
Phoenix District Grazing Advisory Board  
Phoenix District Public Lands Advisory Board  
Public Lands Council  
Safford District Grazing Advisory Board  
Safford District Public Lands Advisory Board  
Sierra Club (local and national)  
Wild Burro Protection Association  
Wilderness Society  
Wildlife Society

## ELECTED REPRESENTATIVES

### Federal

Senator Dennis DeConcini  
Senator Barry Goldwater  
Representative Jim Kolbe  
Representative John McCain  
Representative Eldon Rudd  
Representative Bob Stump  
Representative Morris K. Udall

Senator Al Stephens  
Representative Gus Arzberger  
Representative Bart Baker  
Representative David Bartlett  
Representative Janice Brewer  
Representative Dave Carson  
Representative Bob Denny  
Representative Reid Ewing  
Representative Henry Evans  
Representative Edward G. Guerrero  
Representative Larry Hawke  
Representative Roy Hudson  
Representative Jack B. Jewett  
Representative Joe Lane  
Representative Sam A. McConnell Jr.  
Representative Richard "Dick" Pacheco  
Representative James B. Ratliff  
Representative Sterling Ridge  
Representative E.C. "Polly" Rosebaum  
Representative Nancy Wessell  
Representative John Wettaw  
Representative Pat Wright

### State

Senator Bill Davis  
Senator Tony Gabaldon  
Senator A.V. "Bill" Hardt  
Senator John Hays  
Senator Jeffrey Hill  
Senator Greg Lunn  
Senator John Mawhinney  
Senator Peter Rios  
Senator S.H. "Hal" Runyon  
Senator Ed Sawyer





# COMMENTS AND RESPONSES

## Review Process

The draft EIS was filed with the Environmental Protection Agency on September 23, 1985. The 60-day comment period ended December 6, 1985.

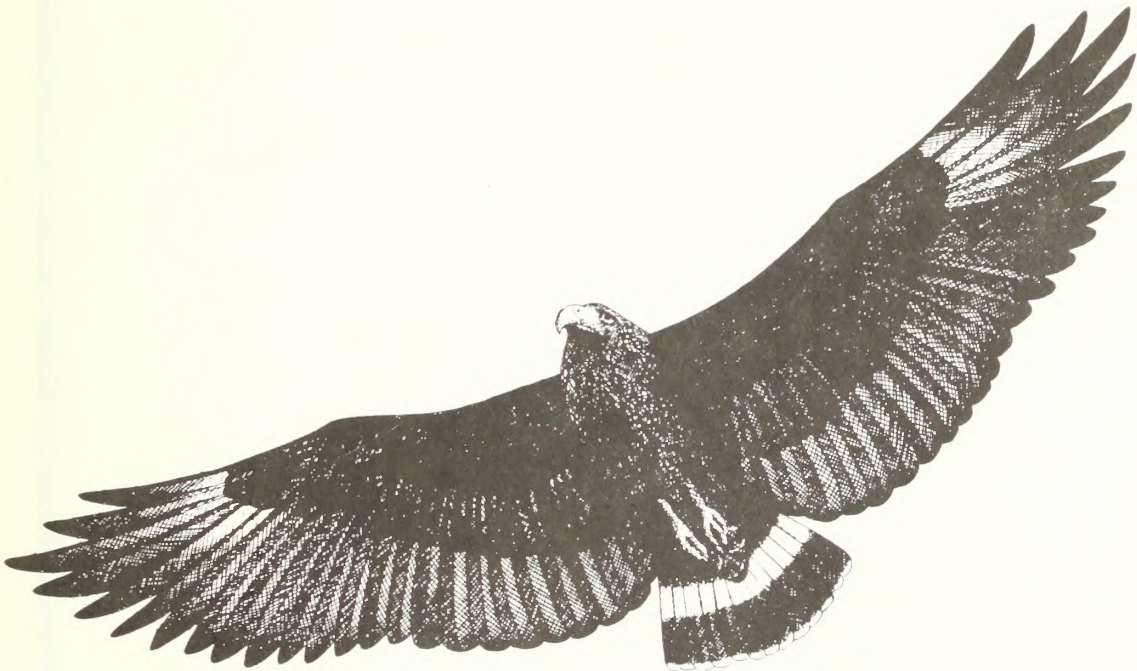
A notice of availability of the draft EIS, including the announcement of public meetings, was published in the *Federal Register* on September 26, 1985.

More than 800 copies of the draft EIS were mailed to federal, state and local government agencies, organizations and individuals for review and comment. News releases from regional papers provided information on how to obtain copies of the draft EIS.

BLM conducted public meetings in St. Johns, Phoenix, Tucson and Sierra Vista on October 29, 30 and November 5, and 6, 1985, respectively, for the purposes of providing additional information or for clarification of the draft EIS. Nineteen letters of comment were received from various agencies, organizations and individuals.

The EIS team reviewed all comments and responded to those presenting new data, questioning the draft analysis or raising issues relating to the environmental impacts of the *Proposed Action* and alternatives. All comments pertaining to the *Proposed Action* or alternatives will be considered by BLM managers in making grazing management decisions for the Eastern Arizona Study Area.

The final EIS, which includes the written comments, will be sent to the Secretary of the Interior, the Environmental Protection Agency and those agencies, organizations and individuals who received the draft EIS. Copies may be inspected at the following BLM offices: the State Office, Phoenix, Arizona; the Office of Public Affairs, Washington, D.C.; Phoenix, District Office, Phoenix, Arizona; and the Safford District Office, Safford, Arizona.







ARIZONA STATE PARKS

1680 WEST ADAMS STREET  
PHOENIX, ARIZONA 85007  
TELEPHONE 802-255-4174

BRUCE BABBITT  
GOVERNOR

STATE PARKS  
BOARD MEMBERS

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REESE G. WOODLING  
VICE CHAIRMAN

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SECRETARY

OUJANE MILLER  
SECRETARY

PRISCILLA ROBINSON  
TUCSON

JAMES STALNAKER  
TLAGOAVI

ROBERTA L. LANE  
STATE LAND COMMISSIONER

MICHAEL A. RAMNES  
DIRECTOR

ROLAND H. SHARER  
DEPUTY DIRECTOR

October 3, 1985

Mr. Lester K. Rosenkrance  
District Manager  
Safford District Office  
Bureau of Land Management  
425 East 4th Street  
Safford, AZ 85546

Re: Draft EIS  
- Eastern Arizona Grazing  
DOI-BLM (Safford)

Dear Mr. Rosenkrance:

I have reviewed the draft report submitted for the above project. The report appears to consider adequately the cultural resources of the project area at this stage of investigation. Pursuant to 36 CFR, Part 800 of the Advisory Council's regulations ("Protection of Historic and Cultural Properties"), we look forward to continuing the consultation process regarding the cultural resources of this project.

We appreciate your cooperation with this office in complying with the historic preservation requirements for federal undertakings. If you have any questions about any of this, please contact me at 255-4174.

Sincerely,

*Teresa L. Hoffman*  
Teresa L. Hoffman  
Archaeologist

for Donna J. Schober  
State Historic Preservation Officer  
TLLH:mes



GREATER ARIZONA RANCHES  
7225 North Oracle Road  
Suite 200 A  
Tucson, Arizona 85704  
(602) 297-6009

October 11, 1985

District Manager  
Bureau of Land Management  
Safford District Office  
425 East 4th Street  
Safford, Arizona 85546

Re: Sept. 1985 Environmental Impact Study

Dear Sir:

With regards to the above noted study, Greater Arizona Ranches wishes to comment as to the fact that we are in favor of leaving the range and the guidelines as they are established today.

Sincerely,

*Werner G. Goering*  
Werner G. Goering  
President

WGG/jlm  
cc: Phoenix District

3

8552 Bawn Dr  
Knoxville TN 37923  
October 14, 1985

District Manager, BLM  
Safford District Office  
425 E 4th Street  
Safford, Arizona 85546

Dear Sir,

Thank you for the opportunity to comment upon the draft Eastern Arizona Grazing Environmental Impact Statement. I found the document interesting and informative, but there are a number of problems which I will discuss below.

The first problem is the range of alternatives which were reviewed. While four alternatives are presented, alternatives A, B, and C are only slight variants of each other. The only difference between them is how much effort will go to necessary grazing. Alternative D is quite different from the others, but it is an unreasonably alternative; grazing is not going to be eliminated from all public lands.

Other alternatives should be considered. One alternative should be to emphasize wildlife which is feasible. It should be feasible to emphasize wildlife on larger tracts of land and on smaller tracts of land which are adjacent to blocks of land managed by others for similar purposes. Furthermore, in addition, where BLM lands are mixed with State lands, the BLM could approach the State and propose that the managed land be managed with a wildlife emphasis.

3-1

It should be noted that management with a wildlife emphasis is not inconsistent with some grazing. Another alternative might be to allocate half the BLM AUMs to wildlife and half to domestic animals. A further variation would be to allow grazing on only half the capacity of the land. This should lead to improvement of the range condition, more wildlife and it should be manageable since the BLM is, presumably, restoring the amount of grazing at present.

Another problem is that the value, how and effects of grazing in riparian area management is not explained. Riparian areas are quite sensitive to damage by cattle. Alternatives A, B, and C give insufficient protection to riparian areas. An alternative which protects riparian areas would require greater goals to the greater possible extent. Such an alternative need not totally exclude grazing though it would be needed in some areas and reduced in others.

The EIS fails to adequately describe the effects of the alternatives on resources. Table 2.2 shows whether the alternative helps positive or negative effects, but neither are the quantitative effects estimated (except for grazing). For instance, the population of desert tortoise is present and under each alternative should be estimated. Similar estimates should be made for other wildlife species and for cultural resources.

3-2

3-3

3-4



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

6 .5

Mr. Lester Rosenkrance, District Manager  
Safford District Office  
Bureau of Land Management  
U.S. Department of Interior  
425 E. 45th Street  
Safford, AZ 85546

Dear Mr. Rosenkrance:

In response to your letter dated September 20, 1985, we have reviewed the Draft Environmental Impact Statement (EIS) prepared by the U.S. Department of Interior for the Proposed Grazing Management Program, Eastern Arizona Area. Our review was directed to whether the action described in the draft EIS involved matters within our jurisdiction by law or special expertise or had any potential impact on NRC licensed facilities. No potential effects were identified; therefore, we have no specific comments on the draft EIS.

Thank you for the opportunity to review the draft document.

Sincerely,

*James P. Knight*

James P. Knight, Acting Director  
Division of Engineering  
Office of Nuclear Reactor Regulation

Table 3-5 identifies a number of areas which are important to wildlife. The disposition of each of these areas under each alternative should be explained. The effects each alternative has on each species on Table 3-6 should be identified.

3-5

One further alternative which should be evaluated is one which is giving maximal protection to cultural resources, especially old Indian sites. This will help close off certain roads to passenger vans from north and south. Grazing might not be much affected except in the non-irrigated areas to ranches who have to use keys to drive onto their allotment.

3-6

Overall, it is clear that the limited available resources have made it difficult to prepare a sufficiently thorough EIS. These concerns and other comments should make it clear that much more work, data collection and analysis are required if we are to prepare a Final EIS to result. Thank you for your kind work to date and good luck on what happens.

Please keep me informed of management activities in the area covered by the EIS. Also, please have my name added to the distribute lists for other Arizona Grazing EIS's. Thank you.

Sincerely,

*James A. Old*

Lance McCold





ARIZONA DEPARTMENT OF TRANSPORTATION  
HIGHWAYS DIVISION

206 South Seventeenth Avenue Phoenix, Arizona 85007

BRUCE BARBITT  
Governor  
CHARLES L. MILLER  
Director

W.D. FORD  
State Engineer

October 21, 1985

Mr. Lester K. Rosenkrance  
District Manager  
Bureau of Land Management  
Safford District Office  
425 East 4th Street  
Safford, AZ 85546

Re: Eastern Arizona Grazing-Draft  
Environmental Impact Statement

Dear Mr. Rosenkrance:

Thank you for the opportunity to comment on the Eastern Arizona Grazing Draft Environmental Impact Statement. The proposed action will most likely enhance the vegetative resources of the BLM land in the affected area and increase the value of these assets for the entire public.

The involvement of the State Highway System in this grazing improvement proposal is slight, although the construction of new roads and improvement of existing highways in the future will have some effect as highway rights-of-way are moved or improved. These impacts will be site specific and will not adversely impact the overall effort of rangeland improvement. In all cases, the construction of new highway fencing or the improvement of existing right-of-way fencing will enhance the ability of the BLM allotment manager to control his livestock and assist in better livestock distribution. When highway construction projects are proposed, input into the planning and design process by the BLM administrators, allotment managers, and general public will be invited through the public hearing process.

Again, thank you for providing the Arizona Department of Transportation (ADOT) with the opportunity to review this environmental document. ADOT will pay special attention to future projects which may impact this area of concern. We look forward to continued coordination with the Phoenix and Safford Districts of the Bureau of Land Management.

Sincerely truly yours,

PHILIP A. SACKETT, Manager  
Environmental Planning Services

PAS:WPB:eh



United States Department of the Interior  
BUREAU OF MINES

P.O. BOX 2096  
BUILDING 30-DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

Intermountain Field Operations Center

October 31, 1985

Memorandum

To: District Manager, Bureau of Land Management, Safford District  
Office, 425 E. 4th Street, Safford, Arizona 85546

From: Chief, Intermountain Field Operations Center

Subject: Review of draft environmental impact statement (EIS) for the  
grazing management program in the Eastern Arizona Study Area

As you requested, we have reviewed the draft EIS for the eastern Arizona grazing management program. Our interest in the proposed plan concerns potential impacts on mineral resources and their development.

None of the alternative grazing plans appear to impact mineral exploration or development activity, a conclusion stated in the "Summary of Impacts" on page 8. We have no objection to the document as presented, or to implementation of any of the alternative plans.

*William Kochran*  
Acting for William Kochran

**INTERNATIONAL BOUNDARY AND WATER COMMISSION**  
**UNITED STATES AND MEXICO**  
 THE COMMONS, BUILDING C, SUITE 310  
 4174 NORTH MESA  
 EL PASO, TEXAS 79902



OFFICE OF THE COMMISSIONER  
 UNITED STATES SECTION

NOV 18 1985

Lester K. Rosenkrance  
 District Manager  
 Bureau of Land Management  
 Safford District Office  
 425 East 4th Street  
 Safford, Arizona 85546

Dear Mr. Rosenkrance:

Thank you for the opportunity to review the Draft Environmental Impact Statement (EIS) for the grazing management program in the Eastern Arizona Study Area enclosed with your letter of September 20, 1985 (reference #1792).

The southernmost boundary of the Study Area is along the International Boundary in two locations. The U.S. Section's only concern is in regard to the integrity of the sixty (60) feet wide corridor along the International Boundary reserved by Presidential Proclamation if you propose to place fencing in these areas. The fence along the boundary cannot be placed on the boundary line and any cross-fencing within the corridor must have a gate for access by government vehicles.

Should you have questions regarding this, please contact Division Engineer J. S. Valdez at (915) 541-7335 or FTS 572-7335.

The opportunity to review and comment on the EIS is appreciated.

Sincerely,  
  
 George R. Baumli  
 Principal Engineer  
 Investigations & Planning Division

8-1

United States Department of Agriculture  
 Forest Service  
 Region 3  
 517 Cold Avenue, SW  
 Albuquerque, NM 87102



Reply To: 1950

Date: NOV 18 1985

Lester K. Rosenkrance  
 District Manager  
 Bureau of Land Management  
 Safford District Office  
 425 E. 4th Street  
 Safford, Arizona 85546

Dear Mr. Rosenkrance:

We have received the DEIS on the Eastern Arizona Grazing Management Program (USDI-1417) and have no comments.

JOHN W. RUSSELL  
 Director of Land Management Planning





United States Department of the Interior

BUREAU OF RECLAMATION  
LOWER COLORADO REGIONAL OFFICE  
P.O. BOX 427  
BOULDER CITY, NEVADA 89005

IN REPLY  
REFER TO  
120-1

NOV 19 1985

Memorandum

To: District Manager, Safford District Office, Bureau of Land Management, 425 E. 4th Street, Safford, Arizona 85546

From: Acting Regional Director

Subject: Review of Draft Environmental Impact Statement (EIS) for Proposed Grazing Management Program - Eastern Arizona Area

We have reviewed the subject draft EIS and have the following comments to offer:

- 9-1 | 1. Page 16: The Fish and Wildlife Service Listing Category for Tumamoca macdougallii should be changed from C(1) to PF.
- 9-2 | 2. Page 25, Quail: Mearns quail should be Montezuma quail.
- 9-3 | 3. Page 25, Non-game: Taylor and Walchuk 1980 is missing from the bibliography. Walchuk is also misspelled (EIS has Walchuck).
- 9-4 | 4. Page 28, Burros: No discussion is given on how the burros are currently being managed. If there is an existing Herd Management Area Plan, it should be included in the discussion and list and describe the numbers that will be managed.
- 9-5 | 5. Chapter III: None of the figures are numbered. The figure on page 29 appears as the second figure and yet, based on the discussion, is evidently Figure 3-1. What is the figure supposed to convey and what do the darkened and hashed areas represent?
- 9-6 | 6. Page 41, Vegetation: Because of the importance of riparian vegetation discussed on pages 27-28, Alternative A should be modified to eliminate impacts to riparian habitat and the associated species, such as the black hawk. The Bureau of Reclamation supports the mitigation measures identified on page 59 for wildlife.
- 9-7 | 7. Page 47, Cultural Resources: Grazing impacts are a constant degradation to cultural resources. Therefore, your conclusion of "moderate adverse impacts" is understating the impact.
- 9-8 | 8. Page 51, Cultural Resources, Paleontology: Although there are no data, Alternative B continues the present action of adverse impact.
- 9-9 | 9. Page 57, Recreation: Table 2-2, page 9, assigns a significant negative impact to Alternative D. As noted on page 57, the No Grazing Alternative would increase hunting and wildlife observation opportunities,

9

2

while on- and off-road vehicle travel could be disrupted by fencing public lands. To rate this resource impact as a significant negative impact for Alternative D appears to place an emphasis on motorized recreation travel and devalue the positive benefit of increased hunting and wildlife observation. As indicated on page 32, no visitor use data have been collected for public lands and no attempt has been made to estimate use levels. If your recreation impact assessment is not based on quantifiable data, a justification explaining the reasoning or documentation (i.e., SCORE) used in valuing one type of recreation over another, should be displayed. The distinction between the levels of impact is not clear.

Thank you for the opportunity to review the draft EIS.

*Roy D. King*

9-9



Suite 200, 201 East Indianola  
Phoenix, Arizona 85012

Soil  
Conservation  
Service

United States  
Department of  
Agriculture

November 19, 1985

District Manager  
Bureau of Land Management  
425 East 4th Street  
Safford, Arizona 85546

Dear Sir:

This is in response to your letter of September 20 asking for comments on the draft Environmental Impact Statement for the grazing management program in the Eastern Arizona Study Area.

We have no negative comments, but appreciate the opportunity to review this draft.

Sincerely,

*Verne M. Bathurat*

Acting Director

Verne M. Bathurat  
State Conservationist



The Soil Conservation Service  
is an agency of the  
United States Department of Agriculture

U.S. Government Printing Office: 1983-425-1717A

Arizona  
Department of Commerce  
Bruce Patrick, Governor Beth S. Jarama, PhD, Executive Director

MEMORANDUM

TO: Bureau of Land Management, DOI  
FROM: Arizona State Clearinghouse  
DATE: November 29, 1985  
RE: Bureau of Land Management, Safford District Office  
DRAFT Eastern Arizona Grazing Environmental Impact Statement  
SAI NO: AZ 85-80-0041

This memorandum is in response to the above project submitted to the Arizona State Clearinghouse for review.

The project has been reviewed pursuant to the Executive Order 12372 by certain Arizona State officials and Regional Councils of Government.

The Standard Form 424 is attached along with any comments that were received for submission with the project. The comments are advisory.

Attachments  
cc: Arizona State Clearinghouse  
Applicant

State Capital Tower 1700W Washington Phoenix, Arizona 85007 (602)255-5371

**SIGNOFF EXHIBIT A 67**  
OUR APPROVAL NO. 0244-0008

<b>FEDERAL ASSISTANCE</b> TYPE OF INTENT (OPTIONAL) <input type="checkbox"/> PREAPPLICATION <input type="checkbox"/> APPLICATION		2. AGENCY ARIZONA CANYON DISTRICT PER	3. STATE ARIZONA DATE	4. NUMBER 858-00041	5. DATE ASSIGNED 11/21/99	6. DATE ASSIGNED BY STATE
1. LEGAL APPLICANT BUREAU OF LAND MANAGEMENT Safford District Office 424 E. 4th Street Safford Arizona Contact Person (Name) District Manager		7. EMPLOYER IDENTIFICATION NUMBER (EIN)	8. BLDG. GRAM (From CFDA)	9. NUMBER 11511919	10. TITLE MULTIPLE	11. TITLE BLM
12. PROPOSED FINANCING FEDERAL 00 APPLICANT 00 STATE 00 LOCAL 00 OTHER 00		13. CONGRESSIONAL DISTRICTS OF APPLICANT		14. TYPE OF ASSISTANCE FEDERAL 00 STATE 00 LOCAL 00 OTHER 00		15. TYPE OF APPLICATION Individual 00 Subcontract 00 Other 00
16. PROJECT PROJECT START DATE PROJECT END DATE PROJECT DURATION		17. TYPE OF CONTRACT (For 16.1) Other 00 Other 00 Other 00		18. DATE DUE TO FEDERAL AGENCY		19. FEDERAL AGENCY TO RECEIVE REQUEST
20. EXISTING FEDERAL GRANT IDENTIFICATION NUMBER		21. REMARKS ADDED		22. COMMENTS AS INDICATED BELOW		23. FEDERAL AGENCY TO RECEIVE REQUEST
24. IDENTIFYING AGENCY IDENTIFICATION NUMBER		25. FEDERAL AGENCY IDENTIFICATION NUMBER (ON FEDERAL GRANT IDENTIFICATION)		26. SIGNATURE		27. ACTION TAKEN
28. ACTION TAKEN FEDERAL 00 APPLICANT 00 STATE 00 LOCAL 00 OTHER 00		29. ACTION DATE		30. ACTION DATE		31. ACTION DATE
32. FEDERAL 00 APPLICANT 00 STATE 00 LOCAL 00 OTHER 00		33. FEDERAL 00 APPLICANT 00 STATE 00 LOCAL 00 OTHER 00		34. FEDERAL 00 APPLICANT 00 STATE 00 LOCAL 00 OTHER 00		35. FEDERAL 00 APPLICANT 00 STATE 00 LOCAL 00 OTHER 00

STANDARD FORM 248 (FACE) (FORM 4-84)  
 PREPARED BY OIG CONTROL 4-27

future grazing management options for approximately one million acres of public lands administered by the Bureau of Land Management through its Phoenix & Safford District Offices.

State Application Identification (SAIL)  
 OCT 09 17  
 State AZ 100  
 85800041

Game & Fish  
 Ag. & Hort.  
 Water  
 Land  
 Arid Land Studies  
 Transportation  
 Parks

Region I, II, III, V, VI

TO: Director  
 Wildlife & Horticulture Dept  
 421 Central Express West  
 Phoenix, AZ 85007

FROM: Arizona State Clearinghouse  
 1700 West Washington Street, Room 505  
 Phoenix, Arizona 85007

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5001 if you need further information or additional time for review.

- No comment on this project
- Proposal is supported as written
- Comments as indicated below
- 1. Is project consistent with your agency goals and objectives? Yes  No  Not Relative to this agency
- 2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? Yes  No
- 3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives? Yes  No
- 4. Will project have an adverse effect on existing programs with your agency or within project impact area? Yes  No
- 5. Does project violate any rules or regulations of your agency? Yes  No
- 6. Does project adequately address the intended effects on target population? Yes  No
- 7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar? Yes  No

Additional Comments (Use back of sheet, if necessary)  
*BLM has worked cooperatively for many years to help protect the best interests of the public and we've been glad to help. This plan is detailed on page 13 will continue to have Reviser Signature: Alan... Date: 10-11-99 Telephone: 255-5073*

Reviser Signature: Alan... Date: 10-11-99 Telephone: 255-5073



State Application Identifier (SAI) **85-800-041**  
SRI-AZ-NO

TO: **OCT 09 1985**

Game & Fish  
Ag. & Hort.  
Water  
Land  
Arid Land Studies  
Transportation  
Parks  
Region I, II, III, V, VI

FROM: Arizona State Clearinghouse  
1700 West Washington Street, Room 505  
Phoenix, Arizona 85007

State Application Identifier (SAI) **85-800-041**  
SRI-AZ-NO

TO: **OCT 09 1985**

Game & Fish  
Ag. & Hort.  
Water  
Land  
Arid Land Studies  
Transportation  
Parks  
Region I, II, III, V, VI

FROM: Arizona State Clearinghouse  
1700 West Washington Street, Room 505  
Phoenix, Arizona 85007

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

No comment on this project  Proposal is supported as written  Comments as indicated below

1. Is project consistent with your agency goals and objectives?  Yes  No  Not Relative to this agency
2. Does project contribute to statewide and/or areawide goals and objectives of which you are familiar?  Yes  No
3. Is there overlap or duplication with other state agency or local responsibilities and/or goals and objectives?  Yes  No
4. Will project have an adverse effect on existing programs with your agency or within project impact area?  Yes  No
5. Does project violate any rules or regulations of your agency?  Yes  No
6. Does project adequately address the intended effects on target population?  Yes  No
7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar?  Yes  No

Additional Comments (Use back of sheet, if necessary):

Reviewer's Signature *Steven Stern* Date 10/16/85  
Title Deputy Supp. Technology & Compliance Telephone 255-4174

State Application Identifier (SAI) **85-800-041**  
SRI-AZ-NO

TO: **OCT 09 1985**

Game & Fish  
Ag. & Hort.  
Water  
Land  
Arid Land Studies  
Transportation  
Parks  
Region I, II, III, V, VI

FROM: Christopher J. Bavasi, Ex. Dir.  
MCOG, Region III  
119 E. Aspen St.  
Flagstaff, Arizona 86001

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255-5004 if you need further information or additional time for review.

No comment on this project  Proposal is supported as written  Comments as indicated below

1. Is project consistent with your agency goals and objectives?  Yes  No  Not Relative to this agency
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6. Does project adequately address the intended effects on target population?  Yes  No
7. Is project in accord with existing applicable laws, rules or regulations with which you are familiar?  Yes  No

Additional Comments (Use back of sheet, if necessary):

Reviewer's Signature *Kenneth J. Sweet* Date 10/28/85  
Title Kenneth J. Sweet, Executive Director Telephone \_\_\_\_\_





**ARIZONA WILDLIFE FEDERATION**  
4330 N 62nd St, #102 • Scottsdale, AZ 85251 • (602) 946-6160



Lester K. Rosenkrance, District Manager  
Bureau of Land Management  
Safford District Office  
425 E. Fourth Street  
Safford, AZ 85346

Subject: Comments on Draft Environmental Impact Statement and Proposed Grazing Management Program for the Eastern Arizona EIS area.

Dear Sir:

We are extremely disappointed with both the DEIS, and the Proposed Action. The omissions, contradictions, and omissions throughout the DEIS are such as to make the document difficult to comprehend, and to raise questions as to the thoroughness with which it was prepared. In turn, these questions cast doubt on the Proposed Action.

Chapter 1, Section IV, identifies a fundamental "issue" that the DEIS and the Proposed Action fail to adequately address:

"Has existing grazing impaired wildlife and wildlife habitat?"

According to the preponderance of evidence in the DEIS, the answer is yes, and to a serious extent. Yet, the Proposed Action lacks sufficient significant measures to correct this situation.

The document's paucity of tabular summaries, maps showing the locations of allotments and sensitive wildlife habitat, land ownership patterns, range conditions, etc., and graphic illustrations of range condition, classification, trend, and potential, makes it extremely difficult to isolate specific problem areas.

However, according to table 3-1, only 4% of BLM rangelands in the EIS area are in excellent condition, whereas 60.9% of these lands are in merely "fair" or poor condition. Basin and Range acreage appears to be in particularly deplorable condition with 72.7% classed as fair or poor, and only 3.1% in the "excellent" category. Overall, 83.1% of the acreage is static in trend, with 6.6% deteriorating, and only 7.3% showing an upward trend in range condition. These figures suggest that these rangelands have been improperly or inadequately managed, and that corrective action is required.

Appendix 10 shows that of the 246 Basin and Range allotments, under the Proposed Action, range conditions are anticipated to improve on only 38, while 26 others will be allowed to continue to decline. The Colorado Plateau allotments fare even worse under the Proposed Action, with no improvement in any of the

12-1

12-2

12-3

90 allotments, and declines in range condition in three. On this basis alone, we don't think that this alternative complies with "the Federal Land Policy and Management Act's mandate to provide for the orderly use and development of public rangelands and to preserve the land and its resources." (Summary, Statement of Purpose and Need, pg. vii)

12-3

Throughout the document, the only "Social Elements" discussed are BLM's anticipated reactions to the various alternatives from ranchers. Similarly, "Economics" is discussed only in terms of ranch economics. Ranchers are not the BLM's only constituency. What are the impacts of the various alternatives on the balance of the area's "Social" and "Economic" elements?

12-4

The DEIS is remiss in not assigning economic values to wildlife, and discussing the various alternatives in this perspective. What are the specific impacts of the various alternatives on wildlife populations, and what are the ramifications of these impacts as related to "social" and "economic" issues? What would increased populations of game and non-game species mean to the area's economy, in respect to recreational, consumptive and non-consumptive use of wildlife? We'd like to see this information translated into dollars, to allow a meaningful comparison of alternative uses of rangeland.

12-5

Chapter 1, Section 1, refers to 1,060,000 acres in the study area. Chapter II, Section II, Allotment Categorization, gives a breakdown of acreage by management category. The acreage by category totals 1,046,203. What is the status of the remaining 13,797 acres? Summaries of the information in Appendices 1 and 2 might make this clear, but there are none. We suggest that the Final EIS include summaries of this data.

12-6

The Proposed Action is inadequate in regard to conserving and enhancing wildlife and wildlife habitat. Chapter IV, Section E promises significant beneficial impact on wildlife only for 10 out of 336 allotments. Riparian and aquatic habitats would suffer a "significant negative impact", according to table 2-2. Habitat supportive of most wildlife species will remain static in trend or decline on the majority of the acreage.

12-7

The paltry improvement in some types of wildlife habitat promised by the Proposed Action depends on the construction of "rangeland improvements". The proposed improvements, under Allotment Management Plans for ten "Improve" category allotments, would cost \$437,200, according to table 4-1. Appendix 3, Section 2, d., states that one of the Improve Category Criteria is that "opportunities exist for positive economic return from public investments." Chapter II, Section 11, ppg. 7, includes the statements that "All allotments in which rangeland improvement funds are to be spent will be subject to economic analysis." And further, "the highest priority for implementation generally will be assigned to those improvements with the highest benefit-cost ratio."

12-8

However, these improvements are projected to increase ADM's by 1,288 per year for the short term (14 years, per Chapter IV, Section 11, 4., Basic Assumptions). Even assuming an immediate response of the range conditions to these improvements, by increasing 1,288 ADM's over the short term at the rate of \$1.86, the return on this considerable investment is at the rate of less than 1%. The additional ADM's claimed for the long term life of these improvements would increase the rate-of-return to only 1.6% over the long term. It would appear that these improvements cannot pay for themselves over any reasonably expected useful life.

If expenditures for the proposed rangeland improvements are indeed subjected to the stated economic analyses, we are forced to conclude that they will probably never be built. If these improvements are not developed, range condition and wildlife habitat would remain in status quo condition.

Table 3-5 identifies Important Wildlife Areas, including some having "Wildlife Habitat Improvement Potential", some as "necessary for survival of a species", some as "capable of producing high population of wildlife", some as habitat for Threatened & Endangered species, and so forth. What is the management plan for these areas under the Proposed Action? What are the impacts to these areas, by alternative? These areas are identified geographically only by township. There is no correlation to be made, using the information in the document, between these areas and either land ownership patterns, allotment numbers, or range condition. An omission of this sort is negligent, and confounds any attempt to draw meaningful conclusions concerning these areas. Should we assume, in the absence of any information to the contrary, that all of these areas are BLM acreage, and in poor and declining condition?

Ongoing land exchanges in the EIS area are not addressed. How will these exchanges affect the area? Assumably, consolidation of BLM holdings from small tracts in "checkerboard" ownership patterns will allow more intensive management. Why is there no discussion of these exchanges? No reference is made to planned future disposition of BLM holdings, although plans, including the Land Tenure Plan for the Safford District, now exist.

Chapter IV, Section IV, Section H, in discussing the environmental consequences of the No Action alternative, in regard to recreational use, states: "While recreation opportunities would not decline under this alternative, they would not improve. Recreation use levels would continue to increase regardless of rangeland management due to population increases in nearby cities and towns. Conclusion: Recreation opportunities would not decline under this alternative but they would not improve either. Recreation use levels would continue to increase with population increases."

We are hard pressed to accept the logic of this conclusion. How can recreational opportunities not decline, in the face of increased use, without improvement? In that the Proposed Action will affect only seven more allotments than the No Action alternative, insofar as improving range conditions, (as a result of the dubious AMPs) how can recreational opportunities, (read "wildlife related outdoor activities") not decline under the management program set forth in the proposed action? In its failure to assure continuing viable populations of a variety of wildlife species, and in consideration of the ever increasing demand for both consumptive and non-consumptive use of wildlife, the Proposed Action can be expected to have a significant adverse impact on recreational opportunities.

The production of forage to feed livestock, or the maintenance of wildlife habitat, are the only uses discussed for the EIS area. Ranching economics are elaborately examined in the OEIS, and the data indicates that fewer than 37% of 274 operators are running economically viable operations. Of these, the large operators, thirty are only 1% dependant on BLM acreage. The other 71 large operators are only 10% dependant on BLM lands. This handful of ranchers is having an inordinately adverse impact on range conditions,

12-9

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12-11

while making an insignificant contribution to the area's economy, despite de facto subsidies by way of low grazing fees and range improvements built at public expense. On the other hand, the economic values of wildlife are not quantified in the DEIS. Without quantifying these values, we question how readers of the DEIS, and its preparators, might be expected to arrive at any reasonable conclusions.

Therefore, we feel compelled to ask that the agency's entire constituency be given an opportunity to review an alternative that meets these objectives:

1. Sets forth a range management plan that would,
  - a. establish an "upward trend" in range conditions for all acreage with potential for improvement, if it is presently in less than "good" condition.
  - b. bring all acreage with the potential for "good" condition into "good" condition within twenty years.
  - c. bring all acreage with the potential for "excellent" condition into "excellent" condition within fifty years.
  - d. establish an "upward trend" in all aquatic and riparian habitats, and maintain these areas in their maximum potential condition, once the maximum potential had been reached.
2. Weighs the economic value of wildlife against the economic value of livestock. This comparison should take into account all of the various consumptive and non-consumptive uses of wildlife, and wildlife related recreational activities.

Lacking an alternative that examines the quantifiable values of alternative uses of the resources, the DEIS fails to fulfill the conditions of the statement of "purpose and Need", and is questionably responsive to NEPA and FLMPA requirements. We hope to see extensive revisions in the final document. The continuing single-purpose management delineated in the DEIS and the Proposed Action is neither justified nor acceptable to us.

Sincerely,  
*John Calkins*  
John Calkins  
Greenlee County Director  
Arizona Wildlife Federation

JC:sv

12-12



# Arizona Native Plant Society

P.O. Box 41206 - Sun Station - Tucson, Arizona 85717

November 27, 1985

Mr. Marilyn Jones  
Bureau of Land Management  
Phoenix District Office  
2015 W. Deer Valley Road  
Phoenix, AZ 85027

Dear Mr. Jones:

The Arizona Native Plant Society is committed to the conservation of plants indigenous to the state. Arizona is widely recognized for its tremendous botanical diversity. Unfortunately, many plant communities in Arizona have suffered from improper range management resulting in declines of many plant populations, in soil erosion problems and in some areas the complete alteration of the original plant community. The Society is interested in the range management practices that are proposed for public lands in Arizona. We have reviewed the Draft Eastern Arizona Grazing Environmental Impact Statement and would like further clarification of the following points.

Page 9, Table 2-2. What data can BIM present that indicates the Alternative A will result in a significant positive impact to protected plants? Alternative B is the only alternative that might significantly benefit protected plants. Unless a thorough inventory is conducted of the 75,000 acres identified for impacting Alternatives A and C may result in a significant negative impact to protected plants.

Page 13, Protected Plants, Paragraph 2. The first sentence should be rewritten. The Arizona Commission of Agriculture and Horticulture administers the Arizona Native Plant Law not the uncontrolled collection or destruction of rare or commercially valuable species.

Page 15, Protected Plants. How frequently are the monitoring plots for rare plant species read? Is the current staffing adequate to maintain this monitoring effort?

Page 16, Table 2-2. Cheilanthes pingilei, a category 2 candidate species, occurs in the EIS area. According to the recent US Fish and Wildlife Service Notice of Review (50 FR 39526-29584) Gynandrium wigginsii and Phacelia cephalotes, both category 2 candidate species, occur in the EIS area. Stenandrium thurberi is not a federal candidate for listing under the ESA.

13-1

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13-4

# Arizona Native Plant Society

P.O. Box 41206 - Sun Station - Tucson, Arizona 85717

Page 41, Chapter IV, Protected Plants. To what extent are protected plants, particularly federally listed and proposed species, considered when decisions on grazing management systems are made for a particular allotment? What data indicate that Alternative A will improve habitat for protected plants?

13-5

Page 42,43, Table 4-1. Without a map it is impossible for the reader to determine where the 19 allotments listed are located and thus to comment specifically on rare plant concerns. Given the fact that some 85 plants are listed in Tables 3-2 and 3-3, it is likely that one or more of these species occurs in each of the 14 allotments scheduled for either brush management or seeding. What level of inventory will be conducted to assure that these surface disturbing activities will not impact protected plant populations?

13-6

Will priority be given to the use of Arizona native species in the seeding projects? If not, how will the establishment of the commonly used exotic species such as lovegrass and buffelgrass improve habitat for rare plants?

13-7

All of the allotments for which seedlings are proposed are scheduled for short term and long term increases in AUMs. Will there be adequate periods of rest to assure not only the establishment of seed but the maintenance of treated acres?

13-8

Thank you for the opportunity to comment on this document.

Sincerely,  
*E. LeRoy Brady*  
LeRoy Brady, President





Arizona State Land Department

1424 WEST ADAMS PHOENIX, ARIZONA 85007

November 29, 1985

District Manager Bureau of Land Management Safford District 425 E. 4th Street Safford, AZ 85546

Dear Sir:

As you are aware, the Federal lands addressed in your grazing E.I.S. are co-managed with large tracts of State trust rangeland that are leased for livestock grazing, therefore, any grazing management decisions administered by BLM will also impact state lands. It is for this reason that the staff of the Land Department support your preferred alternative to maintain or improve rangeland conditions through the development of range improvement programs and implementation of allotment Management Plans. Livestock grazing is a legitimate and viable land use that can be derived from both public and state rangelands if managed under proper guidelines that will conserve natural resources and consider other resource values or land uses during the planning process.

After reviewing both your allotment summary data and your criteria for categorizing allotments into either "maintain", "improve", or "custodial" management designations on the surface it appears as though more allotments warrant "improve" status than have been recommended. For example, allotment no. 6013 contains 13,144 acres of public rangeland of which the majority is in fair to poor condition and exhibits a static to downward trend. In spite of this, it has been placed in a "maintain" category. Grouping allotments into the various management categories would be better accomplished through coordination and consultation with both your grazing and multiple use advisory boards and other resource management agencies, such as the State Land Department, Soil Conservation Service and the Arizona Game and Fish Department. In addition, periodic review of such groupings is desirable because circumstances may change as a result of land tenure adjustments or management practices.

The Land Department staff appreciates the opportunity to review this document and look forward to working with you to implement your grazing management program for eastern Arizona.

Sincerely,

Robert E. Yourt

ROBERT E. YOUT Director Division of Natural Resources

REY:ig CC Attach.

Form with sections: FEDERAL ASSISTANCE, LOCAL APPLICANT RECEIPT, PROJECT INFORMATION, APPLICANT INFORMATION, PROJECT INFORMATION, FEDERAL AGENCY, ACTION TAKEN, and SIGNATURE. Includes handwritten data like '85800041', '11-11-85', and 'Safford District Manager'.

STANDARD FORM 247 PAGE 1 (Rev. 10-69) Approved by OMB Circular #117

future grazing management options for approximately one million acres of public lands administered by the Bureau of Land Management through its Phoenix & Safford District Offices.

BRUCE BABBITT, Governor  
CAROL A. ANNUNZIO, Speaker, Chairman  
FRED MARKLEY, Fiscal  
FRANCIS W. WELLS, Treasurer  
FRANCIS W. WELLS, Treasurer



Division  
RUBEN GONZALEZ  
Assistant Director, Operations  
DANIEL L. SCHMIDT

**ARIZONA GAME & FISH DEPARTMENT**

2222 Mel Gentry Road Phoenix, Arizona 85029 422-3000  
December 6, 1985

Mr. Jerrold Coolidge  
Bureau of Land Management  
Safford District Office  
425 E. 4th Street  
Safford, Arizona 85546

RE: Draft Environmental Impact  
Statement for Eastern Arizona  
Grazing

Dear Mr. Coolidge:

The Arizona Game and Fish Department has reviewed the referenced draft environmental impact statement (EIS), and we respectfully submit the following comments for your consideration.

A major complaint our Department has with the draft EIS is that there is no map or other reference which allows the reader to determine the locations of the 336 mentioned allotments. We suggest that, at the very least, the appendix contain geographic locations for allotments, such as county, township, and range.

Additionally, the overall presentation of the document contents is generalized, often with vague or indecisive language. This may partially be due to the large and irregular size of the EIS area, and a result of the classification of the overwhelming majority of the allotments (326) as custodial. However, the EIS area lands are still multiple-use public lands and deserve management attention where their condition is below the renewable natural resource potential, even though they may be surrounded (or checkerboarded) by private land and/or State Trust lands. Further, we believe there should be a provision for an allotment to change status from "custodial" to "managed" or "intensive" classification if:

- resource conflicts are identified, or
- the condition trend is downward and 10-25% of BLM acreage is in a poor ecological condition, or
- the allotment is placed under intensive grazing management, such as an HRW cell, or rangeland reseeding and/or plant eradication program.

An Equal Opportunity Agency

Mr. Jerrold Coolidge  
December 6, 1985  
Page -2-

If the Preferred Alternative (Alternative A) is selected, we foresee no change in present management for most of the EIS area lands, particularly for those public lands in Apache and Navajo Counties; therefore, minimal, if any benefit to either the range or wildlife resource will be realized.

There are a number of specific questions our Department has concerning the draft EIS, and other comments that are presented by document page number.

Summary, Alternative A, Consequences.

How will vegetation resources benefit on custodial allotments? Under the draft EIS it appears that the potential is great for custodial allotments, where BLM is the minority interest, to degrade in vegetative quality. Further, protected plants would benefit only on those 10 allotments with AMFs; their fate on the remaining 326 custodial allotments is unknown.

Soil resources are expected to follow present trends on the "remaining 326 allotments"; however, are the present trends up, down, or static? Additionally, what are the "present trends" for wildlife habitats on the 326 allotments?

We question the statement in paragraph 9 that "Overall impacts to recreation would be beneficial," particularly when only 10 of the 336 allotments will receive management leading to improved conditions.

Summary, Alternative C

The statement is made that 85 allotments would receive cuts in livestock use under this alternative, and yet the Preferred Alternative intends to take no action on these allotments. What is the rationale for this decision?

Chapter 2, The Alternatives

An alternative action that has not been included in the draft EIS involves land tenure programs. Land exchange between BLM and both state and private entities is a viable solution to minority ownership tracts of land or checkerboard land ownership patterns, which can result in a blocking up of land under a single ownership for more effective and efficient management. The Department is cognizant of various realty actions that have and are occurring to accomplish this result, but we believe that this fact should be mentioned in the draft EIS.

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15-1



Natural Resources Defense Council, Inc.

25 KEARNEY STREET  
SAN FRANCISCO, CALIFORNIA 94108  
415 421-6561

Washington Office  
1350 NEW YORK AVENUE, N.W.  
SUITE 500  
WASHINGTON, D.C. 20005  
202 793-7600

December 6, 1985

Terrold Coolidge  
EIS Team Leader  
Bureau of Land Management  
422 E. 4th Street  
Safford, AZ 85546

Re: Eastern Arizona Grazing EIS

Dear Mr. Coolidge:

I have reviewed the draft Eastern Arizona Grazing EIS and submit these comments on behalf of the Natural Resources Defense Council (NRDC). We do not support the "Preferred Alternative" because it will allow unnecessary resource deterioration and harm to wildlife. Instead, we support implementation of Alternative C, "Reduced Livestock Grazing." Overall, the EIS is flawed by a lack of specific proposals and analysis and an unsupported assumption that unidentified future actions will result in range improvement.

The preferred alternative involves maintenance of the status quo in the vast majority of the area and the development or revision of 10 AMPs that will purportedly improve range conditions. Unfortunately, the EIS never describes the proposed terms of the AMPs such as numbers of livestock, seasons of use, utilization levels, grazing systems, etc. Thus, your assertion

16-1

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Public Lands Institute: 1720 KACE STREET • DENVER, CO 80206 • 303 377-9749

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Mr. Terrold Coolidge  
December 6, 1985  
Page -3-

Page 7, Alternative A

Our agency would appreciate being coordinated with on custodial allotments, grazing systems, or season of use decisions.

Page 23, Table 3-5

For Faige Canyon, we question the "M" code. We are unaware of any I&E values for this area.

For Picacho Mountains, we question the "A" code. There are no antelope in the Picachos.

Page 59, VIII Mitigating Measures, D. Wildlife

As part of the monitoring plan, we support the BLM's efforts to study the effects of overgrazing on wildlife food and cover around waters and to develop and implement management guidelines to reduce the size and impact of these areas.

Regarding the introduction of domestic sheep and steers into bighorn sheep habitat, we recommend the following rewording:

"The stocking of domestic sheep into occupied or potential bighorn sheep habitat will not be permitted, and the stocking of steers will require close scrutiny to avoid the introduction of diseases."

In the majority of other public lands in Arizona, where bighorn sheep do occur or are planned for reintroduction, there is a 20-mile restriction on the grazing of domestic sheep from existing or potential bighorn sheep range.

Overall, if the Department were to select one alternative as our preferred, we would choose Alternative C (Reduced Livestock Grazing), as the one more in time with the Department's goals and objectives for wildlife management.

We appreciate the opportunity to review and to provide comments on this draft grazing EIS.

Sincerely,  
Bud Bristow, Director

*Bud Bristow*  
Robert K. Weaver  
Habitat Evaluation Coordinator  
Planning & Evaluation Branch

RKW:lea  
cc: State Clearinghouse, AZ 85-80-0041



**16-1** that implementation of these AMPs will result in range improvement is wholly unfounded.

**16-2** We oppose the one aspect of the AMPs that is identified -- construction of water improvements that will extend grazing into new areas. DEIS at 44. Under this scheme, any improvements in range condition will be offset by the decline in conditions in the new areas. We would prefer that resource problems be solved by implementing intensive management practices rather than by spreading the problems elsewhere.

The EIS recognizes that certain areas are suffering from "accelerated soil erosion which has been caused to some degree by livestock grazing." Id. at 15. The Bureau has proposed these areas for seeding. Again, the preferable course would be to address the cause of the problem -- excessive or improper grazing -- rather than to throw money at the problem.

With regard to seeding, water development, and other planned "improvements," we are concerned that the proposed actions will benefit only livestock, and at great public expense. The EIS fails to analyze the cost-effectiveness of the proposed actions. Such an analysis should be prepared before the improvements are undertaken.

**16-3** We are also very concerned about your failure to propose actions needed to protect the desert tortoise. The desert tortoise is a state-listed species and of significant concern nationally. Yet the Bureau has failed to identify the important tortoise habitats, much less propose any restrictions on livestock grazing that would reduce conflicts with tortoises. The

**16-4**

assertions in the EIS that, "to the extent possible," rangeland developments will not result in "heavy livestock concentrations within crucial desert tortoise habitat," id. at 59, are so vague as to be meaningless. Range developments in crucial tortoise habitat should be prohibited. Specific reductions in livestock numbers and seasons of use should be implemented as soon as possible in order to protect the tortoise. It is unacceptable to allow livestock to continue to degrade tortoise habitat.

Finally, we are not clear on the Bureau's intentions with regard to the collection of monitoring data. Given that you have decided not to adjust livestock numbers or seasons until monitoring data are available, it is particularly important that you specify where and what data will be collected. We also urge you to consider changes in livestock practices where existing data are sufficient to demonstrate the need for such changes.

In sum, the preferred alternative is unacceptable because it is overly vague, will not protect the desert tortoise, and involves range improvements of questionable cost-effectiveness. The entire EIS is marred by reliance on conclusory assertions and lack of specific proposals and alternatives. We urge you to improve the analysis and implement more environmentally sound practices as soon as possible.

Thank you for considering these comments.

Sincerely,



David B. Edelson



# SIERRA CLUB

Grand Canyon Chapter - Arizona

P.O. Box 25A, McNeal AZ 85617

11 December 1985

Lester Rosenkrance  
Secretary District Manager  
USD, BLM  
425 E. 4th St.  
Safford, Arizona 85546

Dear Les,

The following are a few general comments on the Eastern Arizona Grazing Draft EIS. I'm sorry to be getting these to you after the 30-day deadline announced in your 20 September notice, but maybe they will be of use to you anyway in preparing the final.

In general, my greatest concern about the DEIS is the projected effect on riparian and aquatic habitats under the Proposed Action:

in the long term habitat condition would decline in those areas where livestock habitually congregate. Livestock trampling and grazing would reduce broadleaf tree regeneration or eliminate it, and could reduce aquatic animal density and/or diversity. (DEIS, 46)

This is a damning statement which should preclude implementation of Alternative A. Since only 10 allotments (if I follow correctly) totaling 126,581 acres would be even partially protected against this devastation (out of the million or so acres affected by the proposed action), the so-called "Rangeland Improvement" alternative is clearly unacceptable if we are to take seriously our commitment to preserve and protect wetlands in Arizona.

Since the same devastation or worse would occur under Alternatives B and C (Present Management and Reduced Livestock Use, respectively), that leaves only Alternative D, No Livestock Grazing, as the only viable alternative presented in the DEIS. Given no other choice, the Sierra Club supports that alternative.

Hopefully, the final EIS will not follow the narrow path laid down in the DEIS. There should be other choices besides the four alternatives presented, for both ecological and legal reasons. I do not want to get into NEPA requirements here, but I think NEPA clearly requires greater subtlety in defining alternative actions. So does FLPMA, and a sound ecological approach to management would be compatible with the law.

17-1

17-2

In presenting an excessively narrow range of alternatives, the DEIS seems arbitrary and biased in favor of beef production over rangeland productivity. BLM is not in the beef business; the public resources the Agency manages is not livestock, but the rangeland and wildlife resources. Livestock are deliberately released biologically to the public lands, rather than non-motivated local investors of the public lands, except for a certain O.V.S. except that livestock are permitted only for a certain very modest fee while ORV's get in free, and except that livestock are permitted only under certain conditions, the most obvious condition, I would think, is that they not abuse their privilege. Given the past and present abuse documented in the DEIS, BLM's prime concern should be habitat preservation and protection, not beef production, especially in riparian, aquatic and other wetland habitats.

Other parts of the DEIS also seem arbitrary and similarly biased. For instance, the Reduction formula in the Reduced Grazing Alternative (C). The simple division of allotments by only two condition classes (10-25% poor/more than 25% poor) is simply too arbitrary and limited. It does not reflect the complexity of the system it purports to manage, and seems designed to offend the ranching community, and to elicit that public's traditional negative response to any form of reduction. The whole of Alternative D, as presented, can elicit only that same negative.

Thus, none of the alternatives presented seems to have the degree of flexibility needed to match management with the rangeland system. An automatic 50% reduction on all allotments with more than 25% in poor condition cannot fit the diversity of range conditions on all 336 allotments. Even a 90% reduction will not protect sensitive wetlands if the livestock are not restricted from those areas.

17-3

The Final would be greatly improved if it presented not just the four extreme positions of apparently mutually exclusive alternatives, but a mix of those alternatives. Some allotments might require no grazing, some would benefit from reduced grazing or other mitigations; some might need no grazing on part, reduced on other.

The DEIS does not indicate that the BLM will be able to apply such flexible management, except on those allotments which have Allotment Management Plans or Habitat Management Plans already in place. I am surprised that the Agency has so few AMPs and HMPs in effect, and even more surprised that the DEIS does not propose a clear schedule for rapid implementation of AMPs and HMPs on all allotments.

17-4



The Final EIS, in order to adequately address NEPA and FLPMA obligations, and to have credibility with the public, should include such a schedule, and should include the range of conditions permissible under such site-specific plans. These could be put into the Final sort of like the prescriptions in USFS planning documents. That way both the affected private and public sectors, and managers, could know exactly what to expect from BLM actions, and when to expect correction of the deteriorating conditions on public rangeland. For the same reason, the Final should include a clear statement of goals, definitions of success, guidelines for determining when preventative or remedial actions will be taken, and a detailed definition of the terms "range capacity" and "range condition" and the ways they are determined by the agency.

The DEIS implies that BLM judges condition not by habitat or some other ecological parameter, but by allotment. Condition of a diversity of habitats (or other terrestrial ecosystem units) within and transecting allotments is a more sensitive indicator of range condition than allotments is a more sensitive indicator of allotments. If the agency is going to judge condition by allotment, the condition of the most sensitive areas should provide the monitor on which management decisions are based.

17-5

While I am thinking of monitors, I hope the Final describes the monitoring plan to be used for determining condition of the rangelands. The public cannot adequately judge the document without seeing such a plan.

17-6

I would hope the Final would also include a plan for monitoring all affected land for cultural sites. The Sulphur Springs Valley contains many early Native American sites and paleontological sites, but Table 3-7 in the DEIS indicates that none of the BLM land has been inventoried for them. Similarly, only 2900 acres of 79,000 on the San Pedro are accounted for, and this despite the high percentage of known sites in the Upper San Pedro Basin (DEIS, 32). Other divisions of the study area are similarly understudied.

17-7

The study area contains parts of six major Arizona rivers and other important riparian or wetland habitats, yet the proposed action would do almost nothing to improve the threatened and endangered condition of these biomes. The study area includes some of the richest cultural areas in the country, but the proposed action does not address the monitoring and protection of sites.

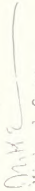
17-8

The only alternative in the DEIS that does provide for protection of these resources is Alternative D, No Grazing. If that alternative is not chosen in the Final EIS, then the Final should at least incorporate the specific goals, monitoring systems and AHP/HMP scheduling suggested above.

Les, I apologize again for not getting these comments to you last week by your proposed deadline. I understand some other concerned parties have had trouble meeting that deadline too, maybe the deadline could be extended a few more days to accommodate those of us who have been busy on other matters? In any case, as I said, I hope these thoughts will be of use to you in compiling the Final EIS and I look forward to working with you in any way I can to help bring our rangeland into satisfactory or better condition.

17-9

Sincerely,

  
Michael Crerory  
Rangeland Management Coordinator



## YUMA AUDUBON SOCIETY

YUMA, ARIZONA 85564

December 5, 1955

Jerrald Colledge, EIS Team Leader  
 Safford District Office  
 U.S. Bureau of Land Management  
 425 E. Fourth St.  
 Sanford, AZ 85545

Dear Mr. Colledge:

The following are Yuma Audubon's comments on the Draft EIS on the Proposed Grazing Management Program for the Eastern Arizona EIS Area. The comments presented below are the work of three of the members of our Conservation Committee.

Throughout our analysis of this EIS we were hampered by the absence of maps showing the locations of the allotments. The document would have been much more useful had such maps been provided.

## PURPOSE AND NEED

The first purpose listed for this EIS is to "... RESTORE and IMPROVE rangeland condition and productivity." (emphasis ours; Summary, p. vii). Yet this is to be an ENVIRONMENTAL impact statement. We feel that this EIS is too short on how the environment can be protected and improved and too long on how some unprofitable cattle operations can be maintained through below fair market value grazing fees subsidized by the American taxpayer.

Why is part of the area covered by this EIS not under an existing Management Framework Plan or Resource Management Plan? When will it be? The Yuma District or Lower Gila South Resource Area tell us that the general plan comes first, and the details of wildlife, recreation, and ACEC plans (and even the ACECs themselves) come later in supplements to the general plan.

## ALTERNATIVES

We cannot support any of the alternatives presented, although Alternative D comes closest to what we feel is needed to restore the integrity of the environment in the area covered by the EIS. We make some suggestions below as to how the alternatives could be modified and expanded.

18-1

Page 1

There are many problems with Alternative A. Development proposals ("Measures for Resource Protection and Enhancement," p. 6) should also include wildlife habitat as one of the minima, not just protected plants and animals.

The nonconsumptive uses that get 60% of the vegetation increase should be specified (p. 6). Of the 40% going to livestock and wildlife, what percentage goes to wildlife?

18-2

If there are to be land treatments (p. 7), seeding should be done only with natives of the area being seeded in order to prevent invasive exotics from becoming established. Nor should herbicides be used because of their unknown potential detrimental effects on the environment.

18-3

It is clear from the EIS that the native wildlife, especially Desert Tortoises and Pronghorn, need the ephemeral vegetation. Because of this, there should be NO ephemeral allotments. RLM states that ephemeral grazing will be permitted when there is the "probability of an ephemeral crop (p. 21)." It would be better to make sure there is abundant vegetation before allowing ephemeral grazing, if it is to be allowed at all. RLM should go out and field check the vegetation in order to determine its lushness, rather than relying on some error-prone prediction method.

Alternative A would result in "significant negative impact" on riparian and aquatic habitat and Bighorn Sheep (p. 9, Table 2-2). RLM's mitigation language for these adverse impacts is so conditional and half-hearted (p. 59): "To the extent possible," "will consider," "could study," "may be," "where necessary," "where a need has been identified," "where commitment to protect critical resources that will be adversely affected by the Proposed Action, only a few of the paragraphs on mitigation (p. 59) state that RLM WILL do something to restore or protect the environment."

18-4

At first, Alternative C looks like an improvement over the Proposed Action. It does recognize that more allotments need quick action than does Alternative A (p. 7). But there is little difference in the ultimate goals of Alternatives A and C. Both would result in an increase in livestock, the same classification of allotments (mostly custodial), the same "improvements," and the same number of AMPs (Table 2-1). Alternative C, like A, would result in "significant negative impact" to riparian and aquatic vegetation and Bighorn Sheep (p. 9, Table 2-2). It would be both better (in the Basin and Range zone) and worse (on the Colorado Plateau) for protected and sensitive species, and better for nongame on the Colorado Plateau and for cultural resources in both zones. Maybe range condition and soils would be a little better under C on the Colorado Plateau. But both Alternatives A and C would have

Page 2

little effect on ranch budgets or finance (pp. 49, 54). Most ranch types would experience increases of one percent or less as a result of all the "improvements" BLM proposes.

Compounding the puny economic increases that would result from Alternatives A and C is the fact that BLM lands are leased for grazing at less than fair market value, making them cheaper than running a feed lot. If the BLM-administered land were leased at the same rate as privately owned land, considerably fewer ranchers would be interested in leasing Federal lands.

A local Somerton cattle company (Leonards) was engaged in a leased land grazing business through the 1950s and 1960s. Then in the early seventies they switched to a feedlot operation as a more economical way of raising beef. The biggest reason was that a feedlot was cheaper than leasing various fields from local farmers, and there were no nearby BLM or State lands to use.

Thus, both Alternatives A and C fail miserably in attempting to increase ranch income and simultaneously fail to provide sufficient protection to prevent further deterioration of an already seriously deteriorated environment (the latter discussed in more detail below).

Alternative D comes closest to attempting to restore and maintain the environment at an acceptable level. Curiously, it is the only one for which BLM feels constrained to mention costs (p. 8). This appears highly prejudiced to us. The improvements BLM proposes under Alternatives A and C aren't free.

Actually, the fencing cost issue is spurious. BLM could implement (if authority doesn't already exist, it would need to be acquired) and impose a fine (including any actual costs) for ranchers whose cattle trespass on Federal lands. If the fine is sufficient, the ranchers will find it more economical to fence their land where it borders on BLM-administered land. They will also be more motivated to maintain the fences.

About 15 years ago Leonard's cattle were grazing a leased area near Joe Henry Park in Yuma. The fence broke and some cattle entered the park doing some damage. The cattle company was liable for all damage. That's why they take out insurance. Why should it be different for cattle trespassing on Federal lands?

While we are tempted to support Alternative D, we share BLM's concern over the effect of fences on wildlife movements. However, Alternative D could result in minimal impacts to wildlife and continued cattle production on BLM lands if modified as suggested below.

## 18-6 18-7

BLM clearly should have addressed a wider, more innovative range of alternatives rather than presenting the usual all-or-nothing, or somewhere in between approach to an EIS.

### ALTERNATIVES THAT WEREN'T CONSIDERED BY BLM BUT SHOULD BE

One alternative should be letting cattle growers lease small areas of Federal lands and set up feed lots. The impact to the small area would be devastating but it would be small in comparison to the one million acres or so now subject to livestock impacts. The feedlots could be located away from sensitive cultural and natural resources and would be built, maintained, and fenced at the cattle grower's expense. Since the Federal government seems wedded to a policy of subsidizing the livestock industry (recent Congressional action and inaction on the grazing fee formula confirms this), the leases could be offered at bargain rates.

Another alternative would eliminate grazing in some (but not all) areas, primarily areas of high wildlife, vegetative, scenic, and cultural value. Sites listed or implied in Tables 3-2, 3-3, and 3-5 are areas where grazing should be excluded to protect natural values. There is little if any evidence that BLM can provide protection to these areas with grazing. We especially emphasize that grazing should not be allowed in riparian areas, areas necessary for survival of a species (such as Redfield Canyon's Bighorn Sheep), areas capable of producing a high population of wildlife, where loss of the area would jeopardize the population (and probably the ecological community; for example, mountain ranges such as the Picechos and Fortilles), prime examples of biotic communities (they didn't get that way because cattle are there) the Tobacco Grassland is an example), areas supporting Threatened and Endangered species (Federal or State and including candidate species until their status is determined), areas with native fish that have greatly suffered as a result of Euro-American activities (such as Fushman Canyon, Cocio Wash, the Gila River, Redfield Canyon, among others), areas with Bighorn Sheep (because they are repelled by cattle and because of the potential for transmission of deadly diseases to them by cattle; see also your own EIS at p. 25 in the section on Bighorn Sheep and p. 59), and areas necessary for forage by a species (such as Redfield Canyon and wherever there are Desert Tortoises).

Certain allotments are in such poor condition that grazing can be suspended immediately until the environment can recover to a more healthy level. BLM's Alternative C would take action on allotments with 10% or more of the BLM acreage in poor condition, with reductions of 25% or 50% (the latter where more than 25% of the BLM acreage is in poor condition). We feel that only complete removal of the cattle will permit the land to recover, and this may take some time. BLM's 90s1



should be to have the vast majority of the land in excellent condition, with some in good condition. Fair is just not acceptable--and BLM doesn't even have that goal for many of the allotments in this EIS. Our understanding is that fair condition means only 25%-50% of the potential vegetation present. Fair thus means that an area is seriously denuded and poor is a disaster area, yet about 57% of the EIS area (and 73% of the Basin and Range area) is in fair or worse condition, and nearly 90% of the EIS area has either a static or even downward trend (Tables 3-1, 4-15). We suggest that this large area needs immediate action to restore the environment to a reasonable level of quality.

It becomes obvious that neither Alternative A nor C will adequately improve the deteriorated environment of this area when the amount of land outside of intensive allotments that is poor or downward in trend is examined. Of land in poor condition (95,475 acres), 84% (81,505 acres) is OUTSIDE the allotments proposed for intensive management. And of land in downward condition (88,760 acres), 72% (49,348 acres) is OUTSIDE the allotments proposed for intensive management. This doesn't even consider land in only fair condition. Figures are in or calculated from Tables 3-1 and Appendices 1 and 2). Thus BLM has in effect written off 61,505 acres (77.1 square miles) of poor condition land and 49,348 acres (77.1 square miles) of downward trend land by putting it in custodial and maintenance classes even though the land is crying out for restoration of better condition and trend.

One of BLM's arguments for not doing anything about allotments classified as custodial is that they are too small to be worth the expense of management. Again, this is a spurious argument. First, BLM never considers exchange of small allotments with ranchers whose land surrounds them or others. This should be included in all the alternatives. Second, while many of these individual parcels may be "small" to BLM, collectively they comprise a large area (96 square miles of poor condition land; this is larger than at least two counties in West Virginia).

#### THE AFFECTED ENVIRONMENT

(We note in passing that some citations in this and other chapters were not in the Bibliography, e.g., AGSFD 1984 on p. 21, Taylor and Walchuck 1980 on p. 25, Moore et al. 1979 on p. 57.)

**NONGAME.** On p. 25 ("E. Nongame"), BLM hints at but does not admit the tremendous degree of competition between cattle and wildlife for vegetation. The EIS states that "The major limiting factor to many nongame species in the EIS area is cover" and "Riparian vegetation has high vegetation production but in many cases only the upper canopy layer is present." Where did this cover and lower canopy layers go? We suspect it

18-8

Page 5

wound up in the stomachs of cattle or sneaked under their hooves. This continues to demonstrate how much BLM needs to do to provide viable riparian habitat and vegetation in general so that it can support wildlife. At the same time, we wonder whether BLM has considered the needs of arboreal species in riparian habitat. The statement "Sufficient cover under 15 inches high is a habitat requirement for the area's nongame species" (p. 25) does not seem to recognize the importance of higher layers of vegetation (and having trees in the first place) for arboreal species.

**CULTURAL AND PALEONTOLOGICAL RESOURCES.** It is not clear how much of the EIS area has been covered by Class II and Class III studies. This is a serious area for cultural sites, with most of the major prehistoric cultural traditions of the Southwest culture represented (e.g., Anasazi, Hohokam, Mogollon, Cochise, Paleo-Indian). Southeastern Arizona has been especially critical to understanding the Paleo-Indian period. Athabaskan Apache and Navajo prehistoric and archaeological sites are also relatively little-studied and any such sites found would be extremely important. Trampling of sites by cattle thus seems to us to be a serious problem that BLM has not adequately addressed. How many National Register listed or eligible sites are there in the EIS area? This should be included in the EIS.

We also recommend that BLM give more priority to determining the condition of paleontological sites so that appropriate action can be taken to protect them. Southeastern Arizona has been important in providing fossils of Pleistocene animals. Mogollon Rim area also has areas of abundant fossils.

**RECREATION.** We feel that this EIS does not adequately assess the negative impacts of cattle on recreational experiences. We contend (from our own experience) that the presence of cattle or their remains (cow pies, cow chips, meadow muffs) significantly detracts from the recreational experience. The presence of cattle can be very intimidating, especially to the highly urbanized population which makes up the majority of residents of this state. The destruction of riparian and other habitats and plants by cattle also detracts from the recreational experience. Filled streams and waterholes detract from the recreational experience. Perhaps the absence of cattle would increase the number of recreational users, thus offsetting the economic impact of removing the cattle, at least in high quality areas with popular resources.

**ECONOMIC CONDITIONS.** BLM's data in Table 3-10 (p. 36) demonstrate that the large operators on the Colorado Plateau are dependent on BLM for 1%, while medium size operators on the Colorado Plateau and large size operators in the Basin and Range are dependent on BLM for 10%. Thus 41.2% of the

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18-9

18-10

18-11

Page 5



operators depend on BLM for 10% or less. We suggest that given such low dependency rates, removal of cattle, at least in the critical areas enumerated above, would have little significant impact on the operators and virtually no impact on production of beef in the context of the Arizona (not to mention national) economy. BLM also admits that implementing Alternative C, in which 84 allotments would be reduced by 11,035 AUMs, "would not have a seriously negative impact" to the majority of the allotments. Also, the EIS never indicates what grazing fees are and how much (or little) the public receives for leasing public land for private grazing.

**SOCIAL ELEMENTS.** This is usually the weakest part of an EIS, and this one is no exception, when any information does appear, assertions are rampant and conclusions are seldom based on statistically verifiable research methods. The greatest discrepancy of this section in this EIS, however, is that only one social element, ranchers, is even considered (and then only briefly). Surely an EIS concerning public lands should consider all publics, not just one. This section is totally inadequate and should be augmented with high quality data if it is going to appear.

#### ENVIRONMENTAL CONSEQUENCES

**BASIC ASSUMPTIONS (p. 41).** Several of BLM's assumptions appear unwarranted, specifically, #1, that there will be adequate funds and manpower to implement any alternative, #2, that stocking rates are valid, and #7, that weather will be normal. We can only hope that #1 will prove to be so. Since some of the assumptions are unwarranted, BLM should have contingencies built into the grazing plan in case the situation is different.

**IMPACTS OF ALTERNATIVE A. Vegetation (p. 41).** BLM never demonstrates but merely asserts that "the increased livestock use would still allow sufficient vegetation for wildlife and nonconsumptive uses." We would like to see the calculations and reasoning to support this statement. BLM also states that "No increases in vegetation production have been projected for the M and C category allotments." Of course not, in fact, if nothing is done to protect the environment on these allotments (and BLM has nothing planned), there will be a decrease, not an increase. BLM states rightly on p. 44 that "...the allotments with downward trends would show a decline in forage and livestock production in the long term." We would like to know how BLM proposes to mitigate this significant adverse impact.

What kind of "brush" is going to be "managed" in the allotments shown in Table 4-1 (pp. 42-43)? And what species will be seeded? As mentioned above, we oppose introduction of exotic species because of their probability of invasion and

outcompeting native species. Species native to the area should be used for seeding.

**Livestock Grazing (pp. 42-44).** The AUM increases shown in Table 4-1 demonstrate that what BLM plans to deliver will be peanuts in terms of overall cattle production in Arizona and even within the EIS area (about 3771 AUMs, or a 3.3% increase over what is authorized now). Thus, we question the value of the intensive management program which hardly increases the AUM level in a few allotments while ignoring the vast majority of allotments, many of which are in serious need of improvement. Not only would allotments with downward trends continue to decline, but allotments with static trend would stay in their largely fair to poor condition.

Intensive grazing management will "require more labor to maintain pasture fences and move livestock from pasture to pasture" (p. 44). Who will pay for these improvements--the hardware and the labor to install and maintain them? Will they pay?

**Wildlife (pp. 44-47).** There are two adverse impacts on wildlife that BLM apparently plans neither to mitigate nor list as unavoidable adverse impacts. The first is decline in wildlife habitat or static trend of wildlife habitat. Poor condition in custodial allotments (p. 44). The second is the adverse impact to wildlife from competition with cattle for annuals where ephemeral grazing is allowed (p. 44, again). BLM should mitigate both these significant adverse impacts or else not implement the proposed action, and the mitigation language should be precise, unlike the wishy-washy, slippery, weak, highly qualified statements in D, on p. 59.

While BLM predicts improvement in mule deer habitat in the ten intensive allotments, it appears the improvement will be a phantom for the deer themselves. The rest of the section on mule deer is devoted to explaining how in fact the deer won't be able to use the increased vegetation because they don't like to move into new areas and will face more competition from cattle because the cattle will be in areas they have not been before new watering holes are developed. How does BLM plan to mitigate this adverse impact on the mule deer? We also fail to understand how BLM can class allotments as maintain or custodial when it is admitted that "livestock-deer competition on maintain and custodial category allotments would continue" (p. 44). Only limited or no serious resource use conflicts or controversy are allowed to exist on such allotment classes.

We also find it ironic that BLM predicts negative impacts on Pronghorn Antelope (p. 45) at the same time that the Game & Fish Department is gunning down coyotes from airplanes in order to reduce coyote predation on Pronghorn.

18-19

What will the effect of the proposed action be on Javelina in maintain and custodial allotments? BLM only addresses impacts on Javelina in improve allotments (p. 46).

18-20

While White-winged Doves and Gambel's Quail would benefit from rest from grazing in an area (p. 46), what will they do at other times when the cattle are present? And how does BLM propose to mitigate the adverse impact to Scaled Quail and Montezuma (Mearns's) Quail in maintain allotments? No weasel words, please!

BLM also needs to make a firm commitment to protecting Black Hawk habitat. We question whether letting cattle into an area of 2-3 year old trees is a good idea. We suspect the cattle would destroy the young trees. It would be better to keep the cattle out until the trees are better established. Best of all would be to keep the cattle completely out of riparian areas.

While BLM predicts that Gila Monster habitat would improve in improve category allotments, nothing is said of Gila Monster habitat in maintain and custodial allotments. We suspect it would decline in some areas, remain stable in others (at a largely fair to poor condition).

The whole Conclusion section on pp. 45-47 is a whitewash. The purported benefits of the improve allotments are touted, while the adverse impacts are played down. The last sentence ("The remaining habitats not included in the management areas would remain static or continue along present trends.") is a euphemism that conceals the fact that a considerable area would decline in habitat quality, and apparently BLM plans no attempt at mitigation and not even list it as an unavoidable adverse impact. As you state on p. 56, "No Grazing is the only alternative that would measurably improve habitat on public lands in the custodial allotments now having a static or downward apparent trend." The solution for such custodial allotments follows logically from your above premise.

18-21

Cultural Resources. Since "the nature and degree of these impacts from grazing management have not been adequately monitored and documented" BLM should do a worst case analysis of impacts of grazing on cultural resources, as required in the Council on Environmental Quality regulations implementing the National Environmental Policy Act.

Recreation. On p. 47 the EIS suddenly refers to "management of the rangeland for wildlife and watershed" for the first time in the document. We would like more information on how this fits into the Proposed Action and what actions are planned. On p. 48, again the EIS appears not to address impacts from maintain and custodial allotments, this time to recreation. The EIS also needs to discuss economic impacts of different types of recreation in the EIS area (e.g., sightseeing,

camping, hunting, fishing, birdwatching).

Visual Resources. We object strongly to the highly subjective use of the term "monotonous desert shrubs" on p. 48. Perhaps the desert is "monotonous" to someone used to the more highly vegetated Eastern, Middle Western, Southern, or Pacific Northwestern environment. But an environment consists not only of vegetation but also of animals and rocks. There is a surprisingly high species diversity (even of plants) in the desert in spite of harsh climatic conditions. And many of us love to see the earth bare its soul without the cover of vegetation that so heavily obscures the land in other, more humid areas. Birdwatching is easier, too, without all those trees getting in the way and hiding the birds.

Milderness Values. We only wish that wilderness values were as well protected as BLM claims (p. 49).--"The Proposed Action would not cause adverse impacts to wilderness values because public law and BLM policy do not allow wilderness values to be impaired." The implication that all Congress has to do is pass the Wilderness Act and FLMA and BLM publishes some regulations implementing them and everybody follows the law and regulations. Unfortunately, it hasn't quite seemed to work that way. There are always violations of wilderness law and regulations. We think the EIS should be more realistic and consider the probability that someone is going to violate wilderness law or regulations.

Ranch Economics. On p. 49 we discover that the large Basin and Range ranch would increase its revenue by the whopping sum of \$250 after 20 years as a result of all the improvements BLM proposes in Alternative A. And this princely sum of \$250 would be the result of increased operator workloads and expenses. The medium and small Basin and Range ranchers and all of the Colorado plateau ranchers wouldn't be any better off economically after 20 years, at least from the Proposed Action. Thus BLM plans to increase AIMs by 3.3% to produce a 1% increase in revenue which would benefit only large Basin and Range ranchers. This is clearly counterproductive. Need we say more?

Mitigating Measures (pp. 58-59). As we have stated above, the language in this section is too weak and too qualified. BLM needs to make a firm, strong commitment to mitigation if the Proposed Action is adopted.

Relationship between Local Short-term Uses of Man's Environment and Maintenance and Enhancement of Long-term Productivity (p. 60). We disagree with the last sentence of this section and think it should be changed. The present wording claims that under the Proposed Plan a) "Conflicts in important wildlife habitats would be reduced" and b) "degraded riparian habitats restored." But a) could only





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca 94105

D. Dean Bibbes  
State Director  
Bureau of Land Management  
Arizona State Office  
3707 North Seventh Street  
Phoenix, Arizona 85014

Dear Mr. Bibbes:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled EASTERN ARIZONA GRAZING: APACHE, NAVAJO, YAVAPAI, MARICOPA, PIMA, PINAL AND COCHISE COUNTIES, ARIZONA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-up Action"). This DEIS is rated EC-2 because it is deficient in its discussion of water quality impacts from grazing. The section on mitigation measures especially for riparian areas, should also be expanded in the FEIS. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send two copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Juli Jessen, Federal Activities Branch, at (415) 974-8193 or FTS 434-0193.

Sincerely yours,

*Charles W. Murray, Jr.*

Charles W. Murray, Jr.  
Assistant Regional Administrator  
for Policy and Management

SAFFORD DISTRICT OFFICE

JAN 06 1985

SAFFORD, ARIZONA

Enclosure ( 4 pages )

Stamp: 1001-1085, Date: 12/18/84, 1/6/85, 933

take place in improve allotments, since BLM predicts stability or decline in maintain and custodial allotments. We also fail to find anything in the EIS to assure us that deteriorated riparian habitats WILL be restored. Instead, we get a weak indication that BLM "could study" (not even will study) the effects of livestock on wildlife around waters, and exclusion of grazing animals to promote broadleaf tree reproduction "where necessary" (p. 59). Where does BLM think this is necessary? We contend it is necessary in any riparian area.

We hope that BLM will use the public comment period to make some considerable changes in this EIS and proposed plan, and we thank you for the opportunity to comment.

Sincerely,

*Cary W. Meister*

Cary W. Meister  
President

18-23



Water Quality Comments

1. The Affected Environment chapter should discuss existing water quality more completely. Specifically, the "Surface Water" section (p. 15) should be expanded to explain whether grazing and overgrazing contribute to erosion and subsequently to suspended sediment in runoff during thunderstorms. This section also should discuss compliance with state water quality standards. If violations are reported, the FEIS should discuss whether land management practices are contributing to the problem. This water quality discussion should identify affected stream segments, at least for the worst cases.
2. The DEIS does not adequately address the affected riparian habitats, consequences of grazing in these areas or management practices to avoid impacts from cattle. The "Riparian and Aquatic Habitats" section of the Affected Environment chapter concludes that "Some springs may need protective development to ensure year round water and suitable surrounding habitat." (p. 28) The FEIS should identify these springs and describe the measures that will be taken to protect them. The riparian habitat discussion should analyze conditions of these areas with the Phoenix and Safford Districts. Riparian areas in poor condition and those likely to be impacted by cattle should be delineated. Fencing and other plans to improve or protect these valuable and sensitive habitats should be described in the FEIS.
3. The FEIS should address environmental consequences of grazing more thoroughly. The preferred alternative, for example, projects "negligible overall" water quality impacts (p. 41). This proposal would increase the stocking level in the planning area and therefore threatens a corresponding increase in erosion, coliform bacteria contamination and other nonpoint source pollution. The FEIS should discuss these possible water quality problems and indicate how they may be controlled by mitigation.
4. Water quality also may be impacted by the proposed land imprinting, chaining and prescribed burning which will affect 75,000 acres. Possible water quality impacts from these practices should be discussed.
4. The DEIS does not discuss the use of herbicides. If chemicals will be used, the FEIS should discuss practices which will be employed and present plans to prevent ground or surface water contamination.

19-1

19-2

19-3

19-4

19-5

General Comments

1. The DEIS assumes that "funding and manpower will be available to fully implement any alternative." (p. 41) The document should also explain how the plans will be implemented if funding is insufficient. In particular, the FEIS should suggest stocking rates for the preferred alternative which will protect resources if range improvement plans are not funded.
2. The land treatments of the preferred alternative, which will both improve rangeland conditions and support higher stocking levels, should be explained in greater detail. Land improvement programs under the current management (referenced on p. 50) should be described to provide a baseline for comparison. The history of grazing patterns in the EIS study area also should be included (in Appendix 6) if it will help understand how the range acquired its current condition and how management practices have succeeded in the past. Discussion of range improvement proposals should show how improvements are coordinated with the systematic monitoring system. For example, the FEIS should explain what indicates that an allotment needs improvement and how much improvement will be required before stocking is allowed or increased.
3. The "Mitigating Measures" section (p. 50) is not adequate. We recommend that it be more explicit by discussing specific management practices and mitigation measures which would be implemented. Currently it is quite indefinite. For example, to mitigate for vegetation impacts, the DEIS suggests only "Developing the HMPs for protected plants adversely affected by grazing." These Habitat Management Plans (HMPs) should be described in the FEIS. It is important that means to mitigate and avoid impacts are considered at this general planning stage so that the public can assess the level of mitigation and resource protection intended for the Phoenix and Safford Districts. Deferring such planning to individual Allotment Management Plans (AMPs) and HMPs may forego significant opportunities for mitigation, such as setting lower stocking levels and implementing district wide protection plans.
- The soils and watershed mitigation section also should recommend specific practices. These should respond to problems identified in the expanded affected Environment and Environmental Consequences chapters. We encourage BLM to include definite protective measures in the wildlife mitigation section. These should include guidelines describing when grazing will be modified in the interest of tortoises and how BLM will respond if its "close scrutiny" indicates wildlife disease problems from domestic sheep and steers. A riparian protection plan should be included or referenced.

19-6

19-7

19-8

4. For each alternative, the DEIS reports that grazing will have no adverse impacts on wilderness values. Where grazing is allowed in wilderness areas, the FEIS should describe management practices which will prevent impacts, especially with respect to water quality and riparian areas.

19-9

5. The "Purpose and Need" section (p. 1) should explain how this document fits into the planning process which includes Resource Management Plans (RMPs), AMPS, and HMPs. The discussion should state whether grazing levels set by this plan will be included in the RMP. If this is the case, BLM should discuss whether flexibility will be impaired in the multiple use planning decisions required by the RMP.

19-10

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION\*

Environmental Impact of the Action

LU--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

B1--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

B2--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CBQ.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. (On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CBQ.)

\*From: EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment

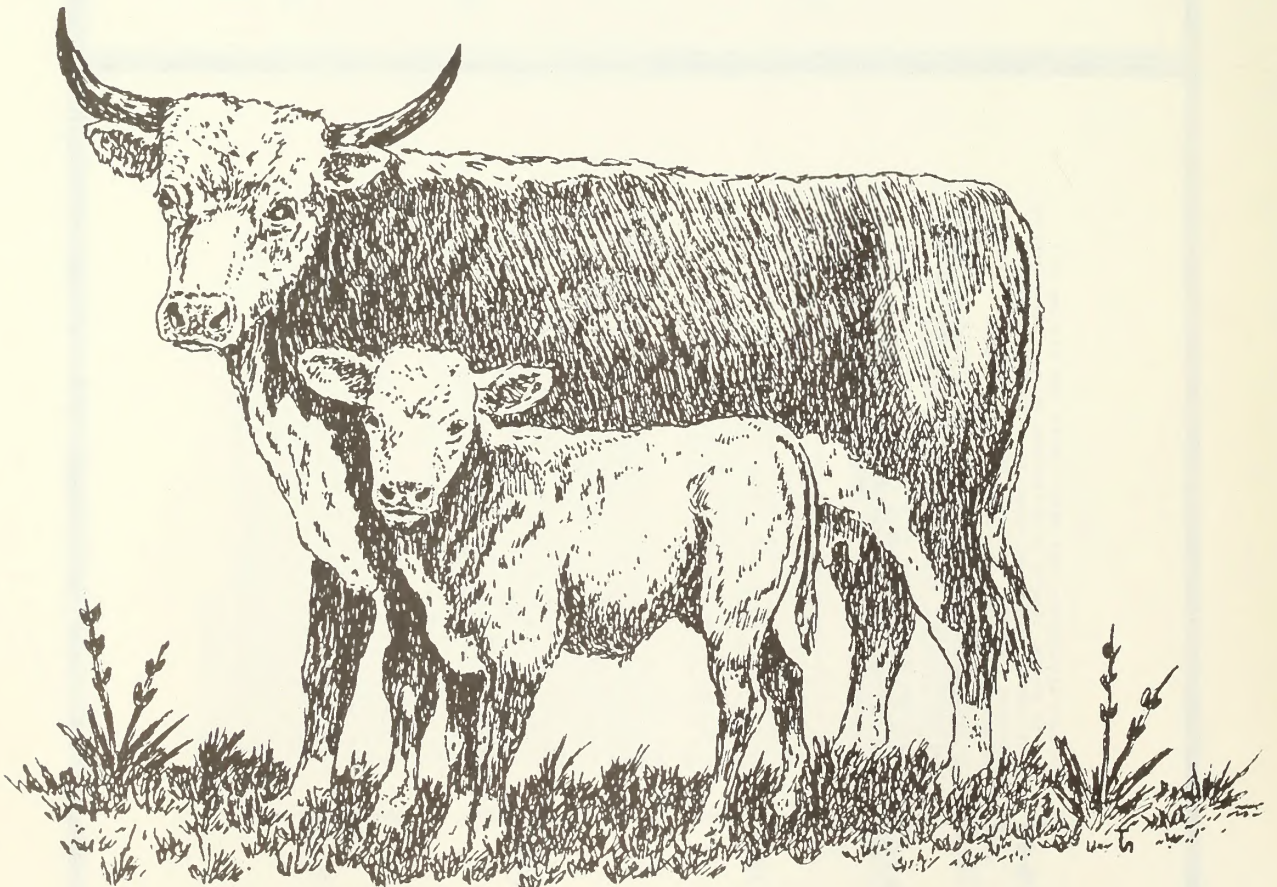


## GENERAL RESPONSES

1. The DEIS presents certain information to the BLM decision makers. It describes the existing environment to the extent known at the time and relative to the degree of anticipated impacts. It identifies and analyzes the degree and nature of expected impacts to the environmental components through the implementation of the various alternatives. It suggests and recommends various measures which could be undertaken to eliminate or reduce the magnitude of those impacts and identifies those impacts remaining after implementation of the action and mitigations. The DEIS is not a decision about actions to be taken nor mitigations to be selected. For this reason the terms "may, could, might", etc., describe recommended mitigating measures. More decisive language is used in the

Record of Decision document wherein management identifies the decisions reached. Decisions made will be for individual allotments; therefore, the Record of Decision may incorporate any or all alternatives found in the DEIS.

2. A number of comments were received on BLM's "failure to propose actions needed to protect the desert tortoise". We have stated we will not construct developments that will concentrate livestock in areas with tortoise populations. We do not have quantitative data on the tortoise populations, but only site records (Insert Map 2—Errata). For this reason we feel site-specific environmental assessments for individual projects is a reasonable way to resolve the issue.





Our current practice of allowing 40% utilization of vegetation by all herbivores ensures tortoise will have food and cover. With a perennial vegetation component established, more annuals would be available for tortoises and other small herbivores.

3. Several concerns were expressed about the effects of increasing livestock numbers. Any increase in numbers would be directly related to the success of the AMPs and land treatments. Increases would be determined through monitoring studies and would be in appropriate increments. We do not anticipate that impacts would be significant as the increased amounts for livestock would still be only 40% of the total forage production. Any increase in livestock numbers must be preceded by further environmental documentation. See also Page 5 DEIS, Implementing Changes on Allotment Management.
4. Some concern was expressed regarding the impact of livestock grazing on wilderness values.

Section 4(d)(4)(2) of the Wilderness Act provides for continued livestock grazing where grazing was established before the areas' designation as wilderness. The Bureau's objective for livestock management in wilderness areas is to utilize the forage in conformity with established wilderness management objectives for each area and the grazing regulations.

Through the development of allotment management plans and/or wilderness management plans, livestock management practices will be developed to accomplish our objectives. These practices will include a determination of the appropriate level of forage use (livestock numbers), the implementation of grazing systems, the maintenance of the range facilities, the construction of additional range facilities, if necessary, and monitoring of the success of the grazing plans and the wilderness management plans.

If specific components of an area's wilderness values (water quality or riparian habitat for example) are adversely impacted by livestock grazing, any or all of the above practices would be modified. This would

prevent degradation of the wilderness values and bring the grazing program back into line with our desired wilderness and livestock management objectives.

5. We acknowledge the need for more discussion of the monitoring plan which is currently in effect. A list of the allotments having monitoring plans, the kind of monitoring taking place and the number of points have been added to the EIS (Errata page 21) for illustrative purposes.

Presently 42 allotments in the Basin and Range Province are monitored. Five of these have photopoints established to provide data on trend. In addition, 37 allotments have photopoints and 200-pace frequency transects to determine species composition and trend. These studies are established in key areas that have representative grazing use and are located one-half to one mile from water. The studies conform with approved monitoring practices.

There are seven allotments being monitored in the Colorado Plateau, each of which has photopoints and 200-pace transects.

All allotments in the Phoenix Resource Area are visually checked annually. If these checks show deteriorating conditions and if resource potential exists, monitoring plots will be established.

All AMPs, whether in place or planned, have the more intensive monitoring plans. Adjustments in livestock numbers may be made if monitoring data indicates that it would be the appropriate measure and following an environmental assessment.

6. Cost/benefit analysis will be done for each AMP.

- 3-1 The four alternatives developed by the interdisciplinary team during the public scoping process represent a reasonable range of alternatives that address the known issues and resource conflicts (DEIS page 2). Other alternatives were considered but were not included (see DEIS page 8 and errata).



- 3-2 Presently forage allocations are 60% for non-consumptive uses (watershed protection, visual, etc.) and 40% for wildlife and livestock. Allocations between wildlife and livestock are not feasible because of the level of intensive monitoring that would be necessary.
- 3-3 Although very small amounts (less than 1%) of the public lands in this EIS area are riparian, BLM is committed to protect riparian vegetation. BLM has undertaken extensive measures in both the Phoenix and Safford Districts to protect or rehabilitate riparian areas. These measures include fencing, water source relocations and rejuvenations through plantings. Such measures are standard mitigations wherever a problem of this nature exists. While these measures have not yet been implemented in the EIS area, both districts are actively identifying areas for these types of management actions.
- 3-4 Estimation of the quantitative effects of each alternative on the desert tortoise and cultural resources were not included because no significant adverse impacts on them were identified by the interdisciplinary team.
- 3-5 Appendix 14 shows the legal description of those allotments which would have Allotment Management Plans (AMPs) or other actions under the Preferred Alternative. This gives a correlation of what actions may occur in the wildlife areas listed in Table 3-5. Anticipated impacts to the affected species listed in Table 3-6 are discussed under the various alternatives. Also see insert Map 3-1 in errata for generalized locations of these allotments.
- 3-6 Significant cultural sites have been fenced as necessary in the past. Road closures are not considered reasonable, as such an action would deny public access to extensive areas of public lands.
- 8-1 If fencing in the corridor were proposed such fencing would be in compliance with your requirements.
- 9-1 See errata.
- 9-2 See errata.
- 9-3 See errata.
- 9-4 Phoenix District is presently developing a herd management plan scheduled for completion in late 1986. The goal is to reduce the herd from 150 to 75-100 head.
- 9-5 See errata for corrections. The darkened areas on the map are the cities of Tucson and Phoenix, the hatched portion is the burro herd area and is located northwest of Phoenix.
- 9-6 See Response 3-3.
- 9-7 We agree that livestock grazing does have negative impact on cultural resources. The "moderate adverse impacts" refer to the development of rangeland improvements.
- 9-8 See errata.
- 9-9 See errata. Table has been revised to display both ORV and non-ORV forms of recreation.
- 12-1 The tables, maps and graphic illustrations supplement the analysis of the impacts discussed in the EIS. Appendix 14 is a tabulation of the location of those allotments for which AMPs are prescribed or land treatments proposed to be implemented under the Rangeland Improvement alternative.
- 12-2 Table 3-1 and Chapter 3 describe the affected environment and existing baseline data. Concern for corrective action is part of the reason for the development of this document. See Purpose and Need, Chapter 1, page 1.
- 12-3 The goal of the Preferred Alternative is to maintain and improve rangeland conditions. This complies with the Federal Land Policy and Management Act.
- The DEIS is not a decision document. The analysis of the Preferred Alternative indicates that some allotments



would decline if this alternative were implemented for all allotments. This is particularly true when improvement potential is lacking or where the costs would significantly outweigh the benefits. Where the resources could be enhanced, i.e., where improvement potential exists, then actions could be initiated to accomplish this. Such actions may include projects to improve wildlife habitat, watershed or recreation.

12-4 Interdisciplinary team analysis failed to reveal any significant impacts to economic and social elements on groups other than ranchers. Because this is a grazing impact statement, efforts were focused on the ranching element.

12-5 Because of the scattered nature of these lands, inability to quantify wildlife populations or wildlife based recreation uses on the public lands precludes the assignment of economic values to wildlife with any reasonable degree of accuracy.

12-6 The figure 1,060,000 is an approximate figure. The actual number is 1,064,838 acres. Of this total, 1,046,203 are leased for grazing. The remaining 18,635 acres are unleased for grazing use.

12-7 Although Table 2-2, page 9, shows significant adverse impacts would occur in riparian areas, mitigating measures to which management is committed would reduce impact levels in riparian areas where problems exist. (See also mitigations, DEIS page 59 and response 33).

12-8 Construction of range improvements is not restricted to benefit/cost ratio considerations, but may be related to multiple use resources. Benefit/cost ratios are developed as part of the AMP development. Further additional cost analysis is conducted to determine the most cost-efficient means to accomplish the various component projects of the AMP.

12-9 The Proposed Action Alternative described in Chapter 2 indicates that

any changes in allotments will involve environmental assessments, monitoring and the use of mitigating measures for resource protection. See pages 5 and 6. This applies to all areas. It is assumed that there are some BLM acreages in each of these areas of high wildlife values. Some of the range improvement projects may be the tools in achieving the potential of some of these areas. The legal descriptions of the allotments (as shown in errata and map) with AMPs or land treatments should help correlate these actions with the wildlife areas.

12-10 The inclusion of an alternative relating to land exchanges was considered but not carried forward (see page 8). When this draft was written, there was no clear direction as to which lands would be disposed of and which lands would be acquired. Identification of such lands would be very speculative.

12-11 We agree that under the *No Action* alternative wildlife-related recreation opportunities would decline with increased recreation use in some of the allotments. In those allotments (or parts of allotments) where the forage condition was not in good or excellent condition and the trend was not static or improving, eventually increased recreation use would adversely impact wildlife habitat and populations and wildlife-related recreation opportunities. Because many of the allotments are in good or excellent condition and have a static or improving trend, increased use would not always adversely impact wildlife-related recreation opportunities. Overall (EIS area-wide), we feel our conclusion for Chapter IV, Section IV, Subsection H, recreation is correct.

This rationale also applies to the *Proposed Action*. Under this alternative there will be some allotments where the rangeland is not in good condition or the trend is not improving. In these cases, wildlife-related recreation opportunities would be adversely impacted by increased recreation use. The management emphasis of this



	alternative would concentrate on those allotments where the rangeland potential is high but condition unsatisfactory, where watershed problems exist, or where conflicts in use patterns of livestock and wildlife exist. Under this alternative forage productivity would increase about 117,019 AUMs. Part of the increase would directly benefit wildlife. In those allotments where forage condition improved, increases in recreation use would not necessarily be detrimental to wildlife and wildlife-related recreation opportunities. We continue to believe the overall impact to recreation would be beneficial under the <i>Proposed Action</i> .		
12-12	We have considered your suggested alternative and have rejected it for the reasons listed below. The section "Alternatives Considered But Not Addressed" now reflects this. Errata for page 8.		
	1. Because of the small and scattered nature of the lands we cannot quantify wildlife numbers.		
	2. Arizona Game and Fish cannot supply wildlife numbers for these lands.		
	3. We cannot quantify hunter activity levels on most public lands in the EIS area because of the small and scattered nature of the land.		
	4. We believe the alternative to be beyond the scope of this EIS.		
13-1	It is the professional judgement of BLM resource specialists that the implementation of Alternatives A, C, and D would result in improved rangeland and thus improved habitat for rare plants present. Rangeland enhancement projects — coupled with the rare plant protection measures listed on DEIS page 6 under Measures for Resource Protection and Enhancement — would prove beneficial to affected rare plant population.		
13-2	See errata. Rewritten to reflect the fact that the law is administered by		the Arizona Commission of Agriculture and Horticulture.
		13-3	In the Phoenix Resource Area, eight plots have been established. They are scheduled to be read twice a year for phenology and success.
		13-4	See errata.
		13-5	BLM regulations stipulate that full consideration be given to listed and proposed plants at the time specific AMPs are implemented.
		13-6	Map has been added to final. The current level of inventory on seeding projects is 100% of 1-2% sample of each section of project area. For linear and small area projects, the inventory is 100% of the affected area. Consideration of changes in these inventory levels will be based upon the sensitivity of the affected area as determined by our data and through Section 7 consultation with Fish and Wildlife Service.
		13-7	Yes, priority will be given to native seed if it is cost effective and if successful planting can be anticipated. The use of buffalo grass and lovegrass will reduce erosion which should improve the habitat for rare plants.
		13-8	Yes.
		14-1	Classifying allotments is normally done through a team review and evaluation of appropriate conditions. See also 15-1.
		15-1	Allotments are always subject to classification changes if the criteria for change are met.
		15-2	No vegetation resource benefits can be anticipated in custodial allotments without cooperative efforts of landowners on other involved agencies.
		15-3	Soil resources generally follow those of the vegetation resource. Soil data is available at District offices for site-specific information.



- 15-4 Wildlife habitats would generally follow trends described for vegetation.
- Wherever threatened and endangered plants are known to exist on any category allotments, BLM has the requirement to develop habitat management plans for the protection of those plants.
- 15-5 See 12-11.
- 15-6 The DEIS makes no decision on implementation, but merely portrays the results of implementing any of the alternatives.
- 15-7 See 12-10.
- 15-8 See errata.
- 16-1 The primary purpose of an AMP is to improve rangeland condition. Past experience has proven that AMPs, when properly designed and carried out, do improve rangeland condition. Prior to implementing the AMP an environmental analysis and benefit/cost analysis are developed. On this basis we have concluded that the implementation of the proposed action would be beneficial to vegetation (DEIS page 41), soils (DEIS page 41) and wildlife habitat (DEIS page 46).
- 16-2 We recognize, as stated on DEIS page 44, that the water improvements could create livestock and deer competition for forage and space. However, water improvement projects as rangeland developments would be subject to mitigations as described on DEIS page 6. A monitoring plan is a basic component of an AMP and if monitoring reveals conditions have changed, then the AMP can be modified.
- 16-3 Cost benefit analyses are a normal part of any AMP or project planning and will be done before implementation of any AMP or seeding.
- 16-4 See General Comment No. 2
- 16-5 See General Comment No. 5.
- 17-1 See response 3-3.
- 17-2 See response on alternatives' development. General Response 1.
- 17-3 Reductions of 50% are not automatic. They are implemented over a 5-year period. This would allow implementation — in the reduced livestock grazing alternative — of a reduction schedule coupled with monitoring studies so that a more appropriate grazing level could be attained. Because these reductions would request changes in allotment management they would be subject to environmental assessments. Monitoring and mitigation are discussed on pages 5 and 6, DEIS.
- 17-4 A clear schedule for development of an activity plan will be deferred until the Record of Decision has been issued. The procedure is described on page 2, Chapter I.
- 17-5 The allotment unit is emphasized in the EIS because decisions will be based by allotment.
- 17-6 See general comment 5.
- 17-7 Cultural resource values are considered at the time of development of site-specific environmental assessments. At that time an inventory of appropriate intensity is conducted. The section, Measures for Resources Protection and Enhancement, page 6 and Appendix 4, page 81, address these concerns.
- 17-8 See response 3-3.
- 17-9 BLM did not regard the deadlines for this EIS as an absolute and all letters received within a reasonable time have been considered.
- 18-1 The Apache-Navajo and Central Arizona Planning Units are included in the Phoenix Resource Area Resource Management Plan (RMP) now being developed. This plan is scheduled for completion in 1988. An RMP for lands in the Cochise Planning Unit is scheduled for commencement in 1987. The Rangeland Program Summary (Record of Decision) for this EIS becomes the



grazing plan for those areas not under a land use plan.

18-2 See response 3-2.

18-3 See response 13-7.

18-4 General Response 1.

18-5 Costs for implementing Alternatives A & C are reflected in Table 4-1, pages 42, 43. There would be no costs of any consequences for implementing Alternative B.

18-6 Response 3-1.

18-7 The two suggested alternatives have been considered by the interdisciplinary team. The first, concerning feedlots, is discussed in errata in page 8.

The second, suggesting elimination of grazing in the seven identified areas and from lands in poor condition, is inherently included in the No Grazing alternative.

18-8 The Existing Environment Chapter describes current conditions. We do not intend to deemphasize the importance of the upper canopy, but to point out the absence of the lower canopy resulting in unsuitable habitat.

18-9 See Response 17-7.

18-10 We agree that the presence of cattle will detract from, or completely spoil the experience of some people recreating on the public lands. The statement cannot, however, be applied to every recreationist using the public lands. The effect of livestock on an experience will vary from person to person and from activity to activity.

The destruction of riparian and other habitat and the fouling of streams and waterholes would certainly detract from a person's recreation experience. It is our goal to manage the public lands to correct and prevent these situations.

18-11 BLM's conclusion on impacts is based on data reflected in Table 4-3 on page 50.

18-12 See 12-4.

18-13 No increased stocking would be permitted until forage availability warranted such an increase and only then following a site specific environmental assessment.

18-14 See Response 12-3.

18-15 Site-specific analyses will be done prior to any work. Specific species would be identified in those documents.

18-16 Costs are normally shared for the construction of range improvements. BLM usually furnishes materials, the rancher provides the labor. Funds for the materials are normally derived from grazing fees.

18-17 This DEIS is not a decision document. We are aware that the implementation of Alternative A would create some significant adverse impacts, if not mitigated, in certain areas. This fact will be considered when management decisions are made to select and adjust the alternatives. The Record of Decision will indicate the final selection, mitigating measures and the monitoring/enforcement program.

18-18 See 18-17.

18-19 We do not anticipate any significant adverse or beneficial impacts to javelina in maintain or custodial allotments under Alternative A.

18-20 We do not anticipate any changes in the condition of white-wing dove and Gambel's quail from present grazing patterns. As the DEIS indicates, impacts on the scaled quail and Montezuma quail would continue on the maintain category allotments. We do not consider these impacts to be significant. Table 2-2, page 9.

18-21 Implementation of Alternative A would not change the grazing pattern on most of the allotments. Therefore, impacts to cultural resources from grazing would not increase from the implementation of Alternative A. Grazing impacts on cultural resources in the AMP and land treatment

	allotments would be considered and minimized by law. We do not believe that the revised CEQ worst case analysis requirements apply in this matter.		and monitoring procedures for any changes in present allotment management. See errata for page 41.
18-22	The impact of livestock grazing on an allotment classified "maintain" would be the same as the analysis on pages 47 and 48 because our management practices are aimed at preservation of a satisfactory forage condition and trend.	19-3	General response No. 3.
	In "custodial" allotments our management involvement and practices are limited and even nonexistent (See Appendix 3, page 80 of the DEIS). As a result there is potential for loss of recreation opportunities. This, however, is not the rule in every case. These "custodial" allotments are often part of larger ranches administered by other state and federal agencies. As such, recreation opportunities are often managed in coordination with the ranch operation and livestock are not permitted to decimate the rangeland condition.	19-4	See response 19-2.
		19-5	Herbicides were not discussed in this document as they are not a means of vegetation control available to us at this time. If use is authorized in future, then an appropriate environmental document will be completed.
		19-6	The assumption concerning full funding is made for analytical purposes and consistency.
18-23	This will be determined, as stated in the DEIS (page 59), by the AMP, HMP or other activity plan.	19-7	General response No. 3.
19-1	Water quality was not discussed in greater depth because the impacts to water quality from the implementation of alternatives were negligible. BLM does comply with state water quality standards. No violations related to livestock have been reported.	19-8	The Mitigating Measures section on page 53 supplements material previously discussed in the section on Management Guidelines (DEIS page 2), Monitoring and Evaluation (DEIS page 2), Management Guidelines Common to all Alternatives (DEIS page 5), and Measures for Resource Protection and Enhancement (DEIS page 6) as well as mitigation measures identified in the Environmental Consequences chapter.
		19-9	By law grazing activities must conform to wilderness management requirements. Therefore, if grazing or any other activity is degrading the wilderness quality, steps must be taken to remedy the problem.
19-2	Hydrology studies have been done. Evaluation of these springs and riparian areas is under way — as problems are identified these protective measures will be initiated. The section on management guidance common to all alternatives, DEIS pages 5, and 6, describes the environmental assessment, mitigation	19-10	Only a portion of the EIS area will be included in the Phoenix Resource Area RMP. Grazing levels set by this EIS will be considered in the development of the RMP. It would be premature to state that they would be acceptable. We do not anticipate that flexibility would be impaired.



# ERRATA

The following corrections and changes have been made to the text of the draft EIS. They are the result of public comment and agency review. The draft EIS, together with this abbreviated final version, constitute the final EIS for the Eastern Arizona Grazing Management Program.

## Page viii

Paragraph 4 — 1st sentence, change “slightly” to “moderately”.

## Page ix

First column, Consequences, paragraph seven, add: Adverse impacts from treatments may occur.

## Page 8

### Alternatives Considered But Not Addressed

During the review period several alternatives were suggested by the public. Some are addressed specifically in the responses to individual letters. Others are discussed below.

A wildlife emphasis alternative was suggested. We believe that either the reduced grazing or no grazing alternatives could be termed as a wildlife emphasis alternative.

An alternative which would establish upward trends for all acreages with potential and with a timetable for accomplishing this was suggested. We believe that, except for specified time periods, these objectives are basically identified in the Reduced Grazing and No Grazing Alternatives.

An alternative to compare economic value of wildlife against the economic value of livestock was suggested. For the following reasons we have not included it as an alternative to be analyzed.

- Because of the small and scattered nature of the lands we cannot quantify wildlife.
- Arizona Game and Fish cannot supply wildlife numbers for these lands.
- Because of the small and scattered nature of these lands, we cannot quantify hunter or non-consumptive uses of wildlife.
- We believe that alternative to be beyond the scope of the EIS.

## Page 9

Table 2-2 connected as follows

- Alternative A — Basin and Range
  - Bighorn Sheep 0
- Alternative A — Basin and Range
  - Archaeology —
- Alternative A — Basin and Range
  - Paleontology —
- Alternative B — Basin and Range
  - Archaeology —



### Alternative B — Basin and Range — Paleontology —

Recreation has been divided as follows:

	A		B		C		D	
	BR	CP	BR	CP	BR	CP	BR	CP
Motorized Rec. inc. ORV Use	0	0	0	0	0	0	—	—
Non-Motorized	++	++	0	0	++	++	++	++

## Page 13

Column 2, Protected Plants, paragraph two. First sentence should read: The uncontrolled collection or destruction of many rare or commercially valuable species is prohibited by the *Arizona Native Plant Law* (ARS, CH 7, Article 1) which is administered by the Arizona Commission of Agriculture and Horticulture with the cooperation of the BLM.

## Page 14

Map number should be 3-0.

## Page 16

*Tumamoca macdouglii* is changed from C(1) to PT *Cheilanthes pringlii* C(2) is added to list as are *Cyanchum wigginsii* and *Phocelia cephalotes*.

Delete *Stenocercus thurberi*.

Monitoring Table  
Basin and Range

Allot. No.	Photo Point	Toe Pace	Photo Plot
6005		4	4
6135		1	1
6026		2	2
6095		4	4
6103		7	7
6104		3	3
6139		1	1
6161		5	5
6169		1	1
6201		1	1
6044		1	
6215		4	4
6222		3	3
6223		2	2
6227		2	2
6239		8	8
6243		1	1
6072		12	12
6016		2	2
6032		2	2
6244		2	2
6042		2	2
6067		3	3
6111		1	1
6120		4	4
6125		2	2
6168		4	4
6197		4	4
6244		3	3
6020	2		
6029		3	3
6133		1	1
6039		4	4
6040		2	2
6068	2		
6075		2	2
6083		2	2
6126	1		
6144		3	2
6153		2	2
6203		1	1
6183			

(F-Bar)

6047	43	9	9
6110			
6156			
6157			
6158			
6061			
6051			
AD			

Bass Aja

All studies read every three years except for 6047 (F-Bar, 5 allots) and these are read yearly.

Photo Point — Photo from same point — general view general trend.

Toe Pace — Indicates cover, frequency and species composition.

Photo Plot — Photo of either 3'x3' or 5'x5' plot indicates species composition and trend.

B&R 38 allots — Toe Pace and Photo Plot  
3 allots — Photo Plot

C/P 1 allot — Photo Point, Toe pace and Photo Plot.

Page 21

Map 3 — Depicting locations of allotments having AMPs or scheduled for AMPs or land treatments.

Page 25

Column 2, Section 2. Mearns quail is currently called Montezuma's quail.

Page 26

Little Colorado River *Spikedace* — should be *Spikedace*.

Arizona Gilbert's Skink — should be "v".

Coati — no longer listed.

Sulfur Bellied Flycatcher — no longer listed.

Page 27

Map 3-1 — Tortoise sightings added to final.

Page 28

Column 1, Section IX. Studies conducted in Cochise, San Pedro and Silver Bell Planning Units attributed to Professional Analysts: 1982 should be changed to Gordon Bronitsky. See Bibliography for full citation.

Page 29

Map should be numbered 3-2.



**Page 30**

Table 3-7. Site Types No. 3 — line 2 — “iddens” should be “middens.”

**Page 31**

Map should be number 3-3.

**Page 42**

The following information should be included as part of Table 4-1.

Errata Sheet for TABLE 4-1

<b>Allot. No.</b>	<b>Legal Description (T&amp;R)</b>	<b>Year</b>	<b>(Actions) to be Implemented</b>
6239	T. 12 N., R. 2 E.	1987	Implement Revised AMP
	T. 13 N., R. 2 E.	1994	Implement Brush Management
6103	T. 7 N., R. 2 W.	1986	Implement Revised AMP
	T. 7 N., R. 1 W.		
6095	T. 6 N., R. 2 W.	1987	Implement Revised AMP
	T. 6 N., R. 1 W.		
	T. 5 N., R. 1 W.		
4408	T. 16 S., R. 21 E.,	1988	Implement AMP
4409	T. 12 S., R. 19 E.	1988	Implement AMP
5284	T. 22 S., R. 22 E.	1989	Implement AMP
6168	T. 4 S., R. 12 E.	1989	Implement AMP
	T. 5 S., R. 12 E.	1989	Implement Seeding
6169	T. 11 N., R. 3 E.	1995	Implement AMP
6020	T. 13 S., R. 10 E.	1989	Implement AMP
	T. 14 S., R. 10 E.	1990	Implement Seeding
	T. 14 S., R. 9 E.		
6183	T. 13 S., R. 9 E.	1988	Implement AMP
	T. 13 S., R. 10 E.	1986	Implement Seeding
	T. 14 S., R. 9 E.		
6032	T. 5 S., R. 11 E.	1989	Implement Seeding
6244	T. 5 S., R. 11 E.	1992	Implement Seeding
6039	T. 7 S., R. 12 E.	1992	Implement Seeding
	T. 7 S., R. 13 E.		
6144	T. 8 S., R. 11 E.	1995	Implement Seeding
	T. 8 S., R. 12 E.		
	T. 9 S., R. 11 E.		
6083	T. 9 S., R. 11 E.	1994	Implement Seeding
	T. 10 S., R. 11 E.		
	T. 10 S., R. 12 E.		
6068	T. 9 S., R. 6 E.	1999	Implement Seeding
	T. 10 S., R. 6 E.		
	T. 11 S., R. 6 E.		
	T. 12 S., R. 6 E.		
6072	T. 11 S., R. 7 E.	1999	Implement Seeding
	T. 11 S., R. 8 E.		
6153	T. 11 S., R. 9 E.	1997	Implement Seeding
	T. 11 S., R. 10 E.		

Allot. No.	Legal Description (T&R)	Year (Actions) to be Implemented
6126	T. 12 S., R. 9 E. T. 13 S., R. 9 E. T. 14 S., R. 9 E.	1990 Implement Seeding

All seedings will have test plots applied 2-3 years before implementing project. Should these plots show negative results, projects could be abandoned.

All seeding projects will have environmental assessments written with appropriate clearings and mitigations before projects will proceed.

**Page 51**

Column 2, Section G. Paleontology — Delete first sentence.

**Page 59**

First column, Section D. New paragraph following paragraph 3. Monitoring of riparian areas as called for in HMPs will point to those riparian areas where acceptable regeneration is not occurring.

**Monitoring Table  
Basin and Range**

Allot. No.	Photo Point	Pace Frequency	Photo Plot
6005		2	2
6135			1
6026		2	2
6095		3	3
6103		4	4
6104		3	3
6139			1
6161		3	3
6169			1
6201			1
6215		4	4
6222		3	3
6223		2	2
6227		3	3
6239		6	6
6243			1
6072	6		6
6016		2	2
6032		3	3
6244	1		
6042		2	2
6111		2	2
6120		3	3
6125		2	2
6168		6	6
6197		4	4
6244		2	2
6020		3	3
6029		1	1

Allot. No.	Photo Point	Pace Frequency	Photo Plot
6039		2	2
6040			2
6068	2		
6075			2
6083		2	2
6126	3	3	
6144		2	2
6153	2		
6183		2	2
<b>Colorado Plateau</b>			
6047	43	9	9
6110		4	
6156		3	
6157		1	
6158		1	
6061		1	
6051		2	

These are proposed studies that would be initiated under alternatives A and C. All studies will be done every three years except for 6047 (F-Bar, 5 allots) and these will be done yearly.

Photo Point — Photo from same point — general view, general trend.

Pace Frequency — indicates cover frequency and species composition.

Photo Plot — Photo of either 3'x3' or 5'x5' plot indicates species composition and trend.

B&R 25 Allots w/Pace Frequency and Photo Plot

1 allot. w/Photo Point and Photo Plot

1 allot. w/Photo Point and Pace Frequency

8 allot. w/Photo Plot

3 allot. w/Photo Point

CP 1 Allot. w/Photo Point, Pace Frequency and Photo Plot

6 allot. w/Pace Frequency



**Page 69**

Allotments listed on page 69-71, plus first five on page 72 are in Safford District. There are no "M" category allotments in Safford District.

Delete Allotments 4408 and 4409. Public lands in these allotments have been exchanged to the State of Arizona.

**Page 71**

Delete allotment 5284. Public lands in this allotment scheduled for exchange to the State of Arizona.

**Page 75**

Allotment No. 5013 — should be "C" category.

**Page 83**

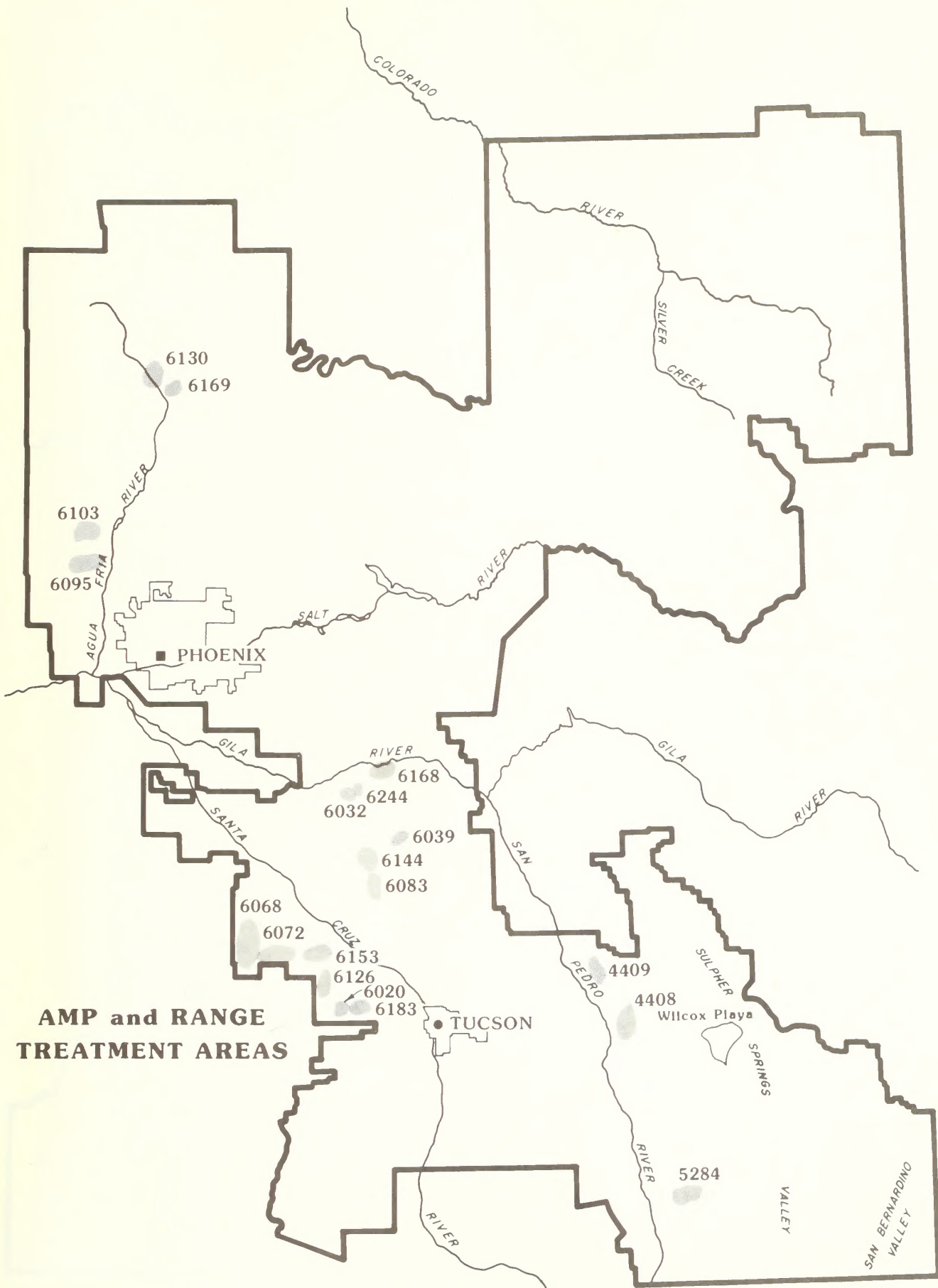
First column, paragraph 4 — last line — "Antevs" should be "Antevs".

**Page 124**

Correct: Sayles, E.B. and Ernest *Antevs*. 1941

**Page 125**

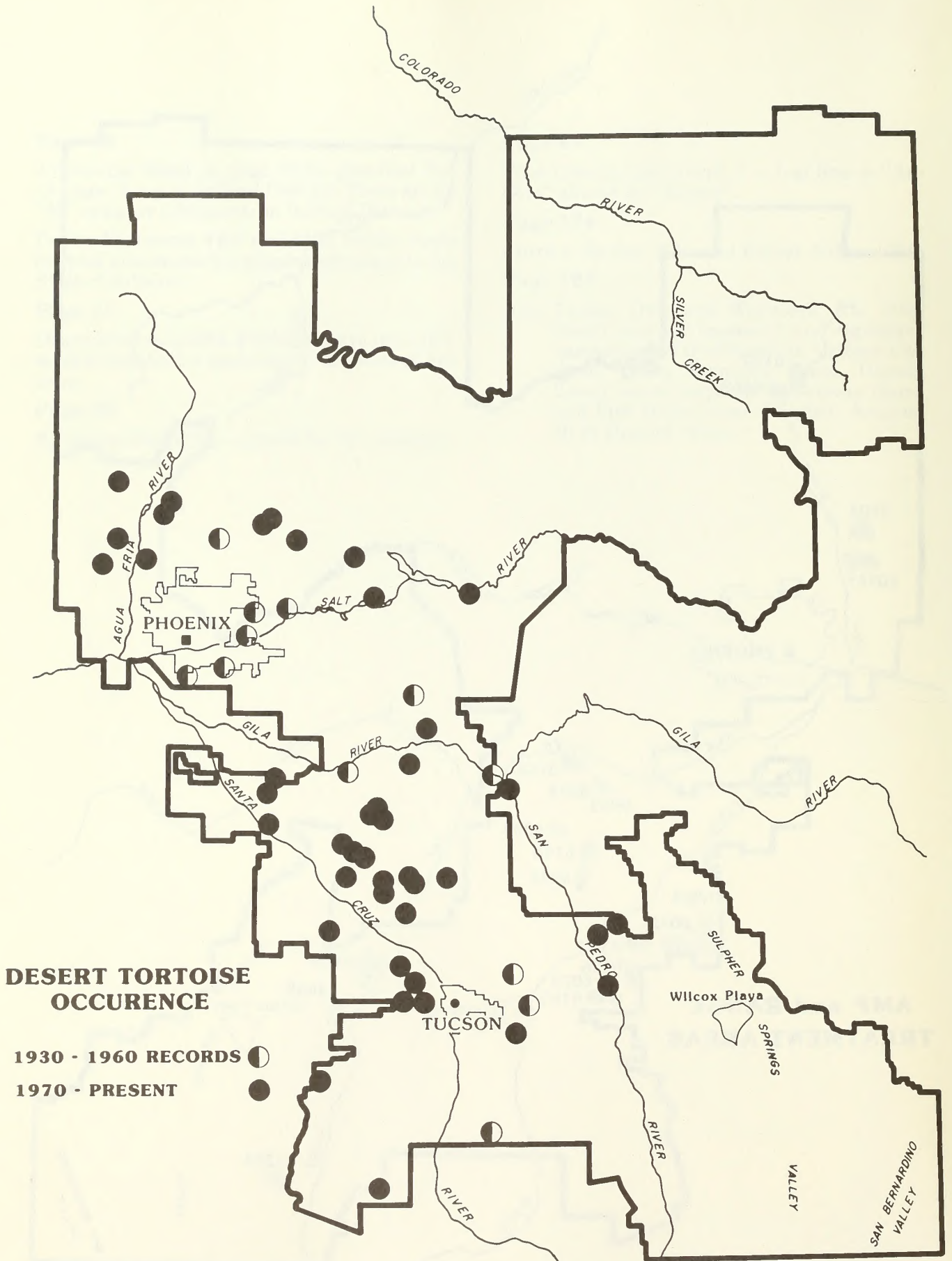
Add: Taylor, D.E., and Walchuck, S.L. 1980. Small mammal inventory and vegetative assessment of the Harcuvar, Vulture, and Skull Valley Planning Units. Unpublished report prepared by Arizona Game and Fish Department. Phoenix, Arizona: BLM District Office.



**AMP and RANGE  
TREATMENT AREAS**

INSERT MAP NO. 1





FROM ARIZONA DESERT TORTOISE HABITAT MANAGEMENT PLAN (ROUGH PARTIAL DRAFT), 1985

INSERT MAP NO. 2







ES-86-005-4200



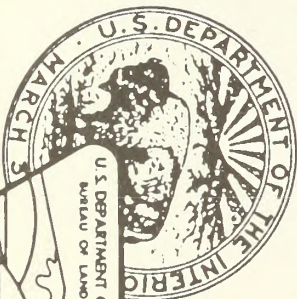
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